# Technical Support Document (TSD) for the Final Transport Rule Docket ID No. EPA-HQ-OAR-2009-0491

## Significant Contribution and State Emissions Budgets Final Rule TSD

U.S. Environmental Protection Agency
Office of Air and Radiation
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This Technical Support Document (TSD) provides information that supports EPA's analysis to quantify upwind state emissions that significantly contribute to nonattainment or interfere with maintenance of the National Ambient Air Quality Standards (NAAQS) in downwind states in the final Transport Rule. The analysis is described in detail in section VI in the preamble to the final rule. This TSD is organized as follows:

- A. Background on EPA's Analysis to Quantify Emissions that Significantly Contribute to Nonattainment or Interfere with Maintenance
- B. Electric Generating Unit Significant Contribution Cost Analysis
- C. Analysis of Significant Contribution Using the Air Quality Assessment Tool (AQAT)
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### A. Background on EPA's Analysis to Quantify Emissions that Significantly Contribute or Interfere with Maintenance

Sections V and VI of the final Transport Rule preamble describe EPA's approach to identify upwind states' emissions that significantly contribute to nonattainment or interfere with maintenance downwind with respect to the 1997 and 2006 PM<sub>2.5</sub> NAAQS and the 1997 ozone NAAQS. As described in the preamble, the approach uses air quality analysis to identify monitoring sites with projected nonattainment and maintenance problems for the PM<sub>2.5</sub> and ozone NAAQS as well as upwind states whose contributions to these monitoring sites exceed specified threshold amounts. See sections V.C and V.D in the preamble and the Air Quality Modeling Final Rule TSD for a detailed discussion of these air quality analyses.

As described in preamble section VI, after identifying upwind-to-downwind linkages based on air quality contribution thresholds, EPA uses a multi-step process to quantify each state's significant contribution and interference with maintenance. The first step in the process identifies the emissions projected to remain in each state at ascending cost thresholds of emissions reductions. See section B in this TSD for discussion of the analysis used in this step. Next, the process uses an air quality assessment tool (AQAT) to estimate the impact of the upwind state reductions on downwind state air quality at different cost-per-ton levels. See section C in this TSD for discussion of the development and use of the air quality assessment tool used in this step.

Preamble section VI.D reviews the information gained from the cost and air quality impact analyses referenced in preamble sections VI.B and VI.C and explains EPA's determination of the resulting specific cost thresholds that are used to quantify each state's significant contribution to nonattainment and interference with maintenance.

The determination was the outcome of first examining, state-by-state, emissions at different cost thresholds for the regulated pollutant. EPA started by examining cost thresholds of \$500/ton for all covered pollutants in 2012. Then, as explained in preamble section VI, raising the SO<sub>2</sub> cost threshold to \$2,300/ton for Group 1 states in 2014. Group 2 states remained at \$500/ton in 2014 and each year thereafter because it was determined their contribution to nonattainment and interference with maintenance was eliminated at that point. All states remained at \$500/ton for annual and ozone season NO<sub>x</sub> for reasons explained in preamble section VI. Remaining emissions at these cost thresholds represent each state's emissions after the removal of significant contribution to nonattainment and maintenance (or in the case of some states for ozone season NO<sub>x</sub>, the progress towards that such removal). Cost thresholds are in 2007 dollars.

A set of Excel spreadsheet files containing AQAT data supporting the final Transport Rule's determination of emissions that constitute significant contribution to nonattainment and interference with maintenance is available in the docket for this rulemaking (Docket ID No. EPA-HQ-OAR-2009-0491) and on EPA's website at [placeholder for website]. Appendix C in this TSD describes these files.

#### B. Electric Generating Unit Significant Contribution Cost Analysis

EPA used version 4.10 of the Integrated Planning Model (IPM) to analyze the annual SO<sub>2</sub>, annual NO<sub>x</sub>, and ozone-season NO<sub>x</sub> emissions reductions available from electric generating units (EGUs) at various cost levels in each upwind state. IPM is a multiregional, dynamic, deterministic linear programming model of the U.S. electric power sector that EPA uses to analyze cost and emissions impacts of environmental policies. See "Documentation for EPA Base Case v.4.10 Using the Integrated Planning Model" and "Documentation Supplement for EPA Base Case v.4.10 FTransport – Updates for Final Transport Rule" in the docket listed above.

EPA first modeled a base case EGU emissions scenario, i.e., a scenario absent any emission reduction requirements related to the Transport Rule. The base case modeling includes the Title IV SO<sub>2</sub> cap and trade program; NO<sub>x</sub> SIP Call regional ozone season cap and trade program; settlements; and state and federal rules as listed in the IPM documentation referenced above. As explained in section V.B of the preamble, the base case does not include the Clean Air Interstate Rule (CAIR), which will be replaced by this rule.

Using IPM, EPA modeled the emissions that would occur within each state at ascending cost thresholds of emissions control. EPA designed a series of IPM runs that imposed increasing cost thresholds for reduction of SO<sub>2</sub>, annual NO<sub>x</sub>, and ozone-season NO<sub>x</sub> emissions and tabulated those projected emissions for each state at each cost level. EPA refers to these tabulations as "cost curves" in preamble section VI.B. 1 The

<sup>1</sup> These projected state level emissions for each "cost threshold" run are presented in a several formats. In

the "state emissions" excel workbook, there is a worksheet titled "all units" which shows aggregate emissions for all units in the state. The "all fossil > 25MW" worksheet is a subset of these units that shows emissions from units that are identified in NEEDs as having a capacity greater than 25 MW. The emissions in the "all fossil > 25 MW" worksheet are used to derive the budgets for each state at the appropriately determined cost threshold. The "fossil & biomass" worksheet reports total emissions from fossil-fired and biomass-fired units, and represents the state level emission total used in the AOAT analysis. These "fossil & biomass" emission totals are used as inputs for CAMx air quality modeling, which is why those

remaining emissions at each cost threshold reflect that which remains after the state has made emission reductions that are available for cost that are less than the particular cost threshold.

This part of the analysis applied cost thresholds to all fossil-fuel-fired EGUs with a capacity greater than 25 MW in each state included in the relevant Transport Rule control program. At all cost thresholds analyzed, emissions projected for covered states reflect the operation of all existing SO<sub>2</sub> and NO<sub>x</sub> pollution controls on a year-round basis in states covered by the Transport Rule for PM<sub>2.5</sub> and all existing NO<sub>x</sub> pollution controls on an ozone-season basis in states covered by the Transport Rule only for ozone.

EPA first conducted this "cost curve" analysis for ozone-season  $NO_x$ . EPA imposed cost thresholds ranging from \$500 per ton to \$5,000 per ton of ozone-season  $NO_x$ . These cost thresholds were applied to the states covered by the final Transport Rule for ozone control as well as to the states for which EPA is issuing a supplemental proposal to require ozone-season reductions, as discussed in section III of the Transport Rule preamble. The IPM-projected EGU emissions of ozone-season  $NO_x$  from the "Fossil > 25 MW" units are shown at each cost threshold for 2012 and 2014 in Table B-1.

EPA then conducted cost curve analysis for annual  $NO_x$ , imposing cost thresholds ranging from \$500 to \$2,500 per ton in states covered in the final Transport Rule for  $PM_{2.5}$ . The IPM-projected EGU emissions of annual  $NO_x$  from the "Fossil > 25 MW" units are shown at each cost threshold for 2012 and 2014 in Table B-2.

As explained in preamble section VI.D, EPA determined that \$500/ton was the appropriate cost threshold for ozone-season  $NO_x$  control at all covered states in this rulemaking. EPA also determined that \$500/ton was the appropriate cost threshold for annual  $NO_x$  control at all covered states in concert with varying degrees of  $SO_2$  control to eliminate significant contribution and interference with maintenance of the  $PM_{2.5}$  NAAQS. In line with these determinations, EPA conducted cost curve analysis for  $SO_2$  while simultaneously imposing cost thresholds of \$500/ton for ozone-season  $NO_x$  in Transport Rule ozone states and \$500/ton for annual  $NO_x$  in Transport Rule  $PM_{2.5}$  states. While holding these ozone-season  $NO_x$  and annual  $NO_x$  cost thresholds constant, EPA examined different  $SO_2$  cost thresholds.

For SO<sub>2</sub> emissions, the lowest cost threshold that EPA modeled is \$500 per ton starting in 2012 and for each year thereafter. EPA did not examine higher cost thresholds for 2012 as higher costs induce advanced control retrofits that require a longer lead time for installation. EPA, however, did examine higher cost thresholds for SO<sub>2</sub> in 2014. Before doing so, EPA first used the Air Quality Assessment Tool (AQAT) to identify improvements in downwind air quality at \$500 per ton. EPA determined that for 7 states, emission reductions at this \$500 per ton threshold successfully eliminated significant contribution and interference with maintenance at downwind receptors, as those receptors no longer had projected nonattainment and/or maintenance problems when emissions were limited by a \$500/ton cost level. These 7 states - Alabama, Georgia, Kansas,

emissions were used as inputs for AQAT. In the Transport Rule proposal Technical Support Document "Analysis to Quantify Significant Contribution", EPA stated that the "all units" emissions used in the AQAT analysis for the proposal and the emissions used in the CAMx air quality modeling were slightly different. EPA committed to determining the origin of the slight difference and removing it for the final Transport Rule. The emissions in the "Fossil & Biomass" correct this slight difference.

Nebraska, Minnesota, South Carolina, and Texas – are referred to as Group 2 states. Because their significant contribution and interference with maintenance was eliminated at this \$500/ton threshold, higher SO<sub>2</sub> cost thresholds were not examined for these states in 2014. For all subsequent cost curve analysis, a constant \$500/ton threshold was imposed on these states' SO<sub>2</sub> emissions.

For the remainder of the states covered for PM<sub>2.5</sub>, EPA examined escalating cost thresholds for SO<sub>2</sub> in 2014. EPA examined cost levels of \$1,600/ton, \$2,300/ton, \$2,800/ton, and \$3,300/ton as a representative sampling of points along the SO<sub>2</sub> cost curve explored at proposal. To assess the upper bounds of the cost curve, EPA examined a very stringent scenario by restricting each Group 1 state's 2014 SO<sub>2</sub> emissions to approximately 30% of that state's emissions modeled at the \$3,300/ton level in 2014. When this type of quantity constraint was imposed, the marginal cost was modeled as approximately \$10,000/ton, and therefore EPA refers to this scenario as the "\$10,000/ton" cost threshold scenario for the remainder of this document. See Table Appendix A-1 in Appendix A for a list of IPM runs. In these costing runs, EPA imposed the annual pollutant cost thresholds identified above on all states covered by the Transport Rule for PM<sub>2.5</sub>. EPA only imposed the ozone-season NO<sub>x</sub> cost thresholds for those states that are covered only by the Transport Rule ozone-season NO<sub>x</sub> program. Because of the time required to build advanced pollution controls, the model was prevented from installing any new post-combustion controls such as selective catalytic reduction (SCR) or scrubbers in 2012, excepting committed controls already scheduled to come online at that time (and therefore also present in the base case). The modeling does include the addition or upgrading of NO<sub>x</sub> combustion controls in 2012.

In these cost curves with ascending  $SO_2$  cost thresholds, cost thresholds for each pollutant ( $SO_2$ , ozone-season  $NO_x$ , and annual  $NO_x$ ) were analyzed simultaneously. This methodology for the final rule's analysis represents a technical improvement on the analysis used in the proposal, where cost thresholds for each pollutant were examined independently with no emission control cost assumed for the other two pollutants (see Appendix Table A-1). The final rule's cost curves reflect a price signal for all pollutants for which that state is covered. This finalized approach better captures the real-world interactions between simultaneous  $SO_2$ , annual  $NO_x$ , and ozone season  $NO_x$  policy requirements across the states covered by the Transport Rule. Cost-effective actions taken to reduce annual  $NO_x$ , for example, may influence the cost of reducing  $SO_2$ . The modeling of these final cost curves captures these important economic interactions.

EPA uses IPM to determine state level emissions at the different cost thresholds. At each cost threshold, IPM state emission totals from "All Fossil and Biomass" as well as from "All fossil > 25 MW" are reported. The "All Fossil and Biomass" worksheet is meant to reflect total state EGU emissions used for subsequent air quality modeling. The "All Fossil > 25 MW" values represent an approximation of emissions from EGUs subject to the Transport Rule. These two state level totals are very close in value. The later is slightly smaller as it is a subset of the former. Table B-6 shows the state-level SO<sub>2</sub> emissions from fossil and biomass units as the Group 1 2014 cost threshold is varied in these final cost curve runs. Note that although the Group 1 cost threshold is the only cost threshold that changes, emission levels in some Group 2 states also vary between these thresholds. Changes in Group 2 state-level emissions in this analysis reveal the interconnected nature of the power sector and the fact that generation and fuel

consumption patterns are not independently determined inside each state. As a result, emission levels from EGUs may vary in a given state based on decisions taken by EGUs in other states connected to the same grid.

These resulting state SO<sub>2</sub> emissions levels from "All Fossil and Biomass" at each of these cost thresholds analyzed were examined in AQAT to determine the impact on downwind air quality. Section VI.D of the preamble explains how EPA considered the results of the cost and air quality analyses described in this TSD to determine the appropriate set of cost thresholds for eliminating significant contribution to nonattainment and interference with maintenance. EPA used the emissions from all fossil and biomass EGUs in its air quality modeling to capture the impact of all upwind EGU emissions on downwind receptors as explained in section C of this document.

EPA used the state level emissions from the "All Fossil > 25 MW" worksheet to determine state budgets at the cost thresholds selected in the final rule. These state level emissions totals can be found for each of the costing runs in the Transport Rule Docket. Because the Transport Rule generally applies to fossil fuel-fired units greater than 25 MW, EPA uses emissions from the "All Fossil > 25 MW" worksheet as an appropriate reflection of emissions from covered Transport Rule units.

These emissions are very close in magnitude to the state level emissions from the "Fossil and Biomass" units used for determining impacts on air quality, but are typically slightly lower as they represent only the subset that is fossil and greater than 25 MW (i.e, potential covered Transport Rule units). Transport Rule applicability is explained in section VII.B of the preamble. The state level emissions for ozone-season  $NO_x$ , annual NOx, and  $SO_2$  emissions from fossil units greater than 25 MW are shown in Tables B-3 through B-5 below. These tables show how state level emissions for each of these pollutants change as the cost threshold is varied for Group 1  $SO_2$  states in the "final cost curves".

As explained in preamble section VI.D, EPA identified \$2,300/ton as the appropriate cost threshold in Group 1 states for addressing significant contribution and interference with maintenance. EPA notes that the \$2,300/ton cost threshold analysis simultaneously applies all of the selected cost thresholds for defining significant contribution and interference with maintenance under the Transport Rule. As explained above, it imposes a \$2,300/ton threshold on Group 1 state SO<sub>2</sub> emissions starting in 2014 (increased from a \$500/ton threshold imposed in 2012), a \$500/ton threshold on Group 2 SO<sub>2</sub> emissions, a \$500/ton threshold on annual NO<sub>x</sub> emissions in PM<sub>2.5</sub> states, and a \$500/ton threshold on ozone-season NO<sub>x</sub> in ozone states. Because the \$2,300/ton analysis included all of these selected cost thresholds under the final Transport Rule, EPA used that IPM run's projected state level emissions remaining in 2012 and 2014 from all fossil units greater than 25 MW as the basis for the state budgets in 2012 and 2014, respectively. Hence, the values in Tables B-3 through B-5 became the Transport Rule state budgets for covered EGUs, with minor exceptions noted below. This is an appropriate level to set state budgets as it reflects the remaining emissions at the state level after the emissions identified by EPA as significantly contributing to nonattainment and interfering with maintenance are eliminated.

In most cases, the remaining state level emissions from all fossil greater than 25 MW at these final cost thresholds became the state budget for EGUs. However, as explained in section VI.D of the preamble, no state's 2014 budget may be larger than its

2012 budget for that pollutant; as a consequence, some states' 2014 budgets are equal to their 2012 emissions from this analysis. Additionally, there were five states whose ozone-season emissions in this analysis were not significantly different from their base case projected emissions in 2012. EPA conducted a sensitivity analysis to confirm that if left uncapped, these states' ozone-season emissions would rise as other states make Transport Rule-related emission reductions, due to shifts between states in electricity generation to meet demand. EPA is therefore setting these states' ozone-season budgets equal to their 2012 base case emissions to eliminate these emission increases. Further explanation of this issue is provided in section VI.D of the Preamble.

The IPM runs are listed in Table Appendix A-1 in of this TSD. This table lists the name of each IPM run next to a description of the run. The runs themselves can be found in the rulemaking docket. In the preamble section VI.B, the emissions presented are rounded to the nearest thousand ton, and in section VI.D they are presented rounded to the nearest ton. In Tables B-1 through B-6 the emissions are presented rounded to the nearest ton

As noted above, EPA applied emissions results shown in Table B-3 in the use of an air quality assessment tool (AQAT) to estimate the impact that the combined reductions available from upwind contributing states and the downwind state, at different cost-per-ton levels, would have on air quality at downwind monitor sites that had nonattainment and/or maintenance problems. In AQAT, the emissions at each cost-per-ton level, were taken directly from the IPM runs. Section C in this TSD describes EPA's development and use of the AQAT and the results from our AQAT analysis. Section C also compares the AQAT results to those produced using the Comprehensive Air Quality Model with Extensions (CAMx).

Table B-1. 2012 & 2014 Ozone Season NO<sub>x</sub> EGU Emissions\* for Each State at Various Pollution Control Cost Thresholds per Ton of Reduction (Tons).

State		e Emission vels	\$500	)/ton	\$1,00	0/ton	\$5,00	0/ton
	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	34,074	31,365	34,203	31,372	33,951	31,393	30,831	29,824
Arkansas	15,037	16,644	14,995	16,565	14,944	16,432	13,969	14,970
Florida	41,646	45,993	27,069	29,607	27,029	29,122	24,277	26,866
Georgia	29,106	19,293	28,185	18,331	28,033	18,323	25,413	17,569
Illinois	21,371	22,043	21,266	21,961	21,313	21,859	20,844	21,505
Indiana	46,877	46,086	46,123	46,471	46,190	46,174	42,769	41,374
Kentucky	37,588	35,296	36,687	34,957	· · · · · ·		33,548	32,483
Louisiana	13,433	13,924	13,435	13,910			13,301	13,728
Maryland	7,179	7,540	7,238	7,540			6,983	7,293
Mississippi	10,161	11,212	10,164	11,212	,		9,106	9,592
New Jersey	3,440	3,668	3,448	3,669	3,407	3,668	3,361	3,648
New York	8,336	9,031	8,329	9,035	8,420	8,910	8,039	8,525
North Carolina	22,902	20,169	22,904	20,182	22,642	19,997	21,240	18,949
Ohio	42,274	41,327	42,302	40,493	41,863	40,375	38,437	38,348
Pennsylvania	52,895	54,217	52,626	54,134	52,444	53,842	49,279	49,444
South Carolina	15,145	16,586	15,108	16,351	14,946	15,958	13,594	14,745
Tennessee	15,505	12,141	15,512	12,126	15,486	12,126	14,715	11,613
Texas	64,711	65,492	63,081	64,341	62,872	64,448	60,419	62,453
Virginia	15,148	15,339	14,662	15,299	14,599	15,116	12,543	13,575
West Virginia	26,464	27,099	26,350	27,014	26,151	26,819	23,988	24,485
Iowa	18,307	19,440	16,526	17,082	16,308	16,996	15,227	15,776
Kansas	16,126	13,967	13,502	10,849	13,502	10,730	12,030	9,506
Michigan	25,989	28,037	26,058	26,250	25,771	26,180	25,381	25,168
missouri	23,156	23,759	22,952	23,759	22,952	23,661	21,433	21,707
Oklahoma	31,415	31,723	21,574	22,059	20,998	21,328	20,009	19,456
Wisconsin	15,876	16,048	13,971	14,134	13,928	14,035	12,412	12,897
Total	654,161 647,439		618,267	608,702	614,807	604,728	573,150	565,498

<sup>\*</sup>Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions have been rounded to the nearest ton. Emissions shown for all fossil-fired units greater than 25 MW when only an ozone season cost constraint is applied to Transport Rule States. Costs are in 2007\$.

Table B-2. 2012 and 2014 Annual NO<sub>x</sub> EGU Emissions\* for Each State at Various Pollution Control Cost Thresholds per Ton of Reduction (Tons).

	onution (		Cost Thresholds per		1011011	<u>xcauction</u>	tetion (10115).	
State		Emission vels	\$500	)/ton	\$1,00	0/ton	\$2,50	0/ton
	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	82,005	74,937	78,468	71,685	77,859	71,670	75,292	70,060
Georgia	66,384	47,808	63,073	40,809	62,921	40,712	59,713	39,457
Illinois	51,969	54,661	48,150	50,541	48,160	50,237	48,665	49,385
Indiana	119,625	116,552	109,506	108,187	108,610	107,176	108,241	99,876
Iowa	42,563	44,614	38,262	39,539			36,647	37,319
Kansas	37,106	32,390	30,991	25,075	30,759	24,815	30,194	23,190
Kentucky	88,136	83,481	85,396	82,657	84,572	81,024	82,150	78,087
Maryland	16,602	17,444	16,590	17,444	7,444 16,496 17,40		16,380	17,396
Michigan	60,594	64,345	60,725	61,088	088 60,482 60,87		59,991	60,110
Minnesota	36,833	37,952	29,588	30,441	29,537	30,432	29,427	30,294
Missouri	53,199	54,528	52,892	54,411	52,827	54,103	50,799	51,036
Nebraska	42,985	43,410	26,481	26,741	26,108	26,374	25,497	20,611
New Jersey	7,391	7,858	7,398	7,866	7,264	7,867	7,124	7,740
New York	17,556	18,505	17,551	18,519	17,643	18,378	17,317	18,290
North Carolina	51,902	46,130	52,021	45,755	51,584	45,617	50,856	43,777
Ohio	100,420	99,389	98,473	94,680	97,444	94,143	94,702	91,686
Pennsylvania	129,125	132,299	120,709	124,106	120,307	123,942	119,063	115,990
South Carolina	34,635	37,862	34,548	37,549	34,305	37,029	32,640	35,996
Tennessee	37,674	29,256	37,676	29,315	37,654	29,395	36,450	28,680
Texas	136,124	140,788	133,141	138,150	132,861	137,582	131,931	136,062
Virginia West	34,567	35,798	33,490	34,785	33,178	34,642	32,416	27,610
Virginia	61,792	64,182	61,702	64,102	61,560	63,831	59,906	60,555
Wisconsin	36,701	36,904	32,078	32,267	31,975	32,008	30,811	30,766
Total	1,345,888	1,321,093	1,268,907	1,235,710	1,261,982	1,228,509	1,236,210	1,173,972

\*Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions have been rounded to the nearest ton. Emissions shown for all fossil-fired units greater than 25 MW when only an ozone season cost constraint is applied to Transport Rule States. Costs are in 2007\$.

Table B-3. 2012 & 2014 Ozone Season NO<sub>x</sub> EGU Emissions from all Fossil Units Greater than 25 MW at Escalating SO<sub>2</sub> Cost Thresholds from Final Cost Curve Analysis (Tons).

	Base	Case	\$5	00	\$1,6	500	\$2,3	300	\$2,8	800	\$3,3	300	\$10,	000
State	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	34,074	31,365	32,285	30,954	32,091	31,481	31,746	31,499	31,749	31,509	31,749	31,513	35,056	31,624
Arkansas	15,037	16,644	15,087	16,652	15,087	16,759	15,087	16,794	15,087	16,794	15,087	16,794	16,690	16,867
Florida	41,646	45,993	27,888	29,657	27,825	29,925	27,825	29,894	27,825	29,700	27,825	29,700	29,034	30,143
Georgia	29,106	19,293	27,949	18,184	27,948	18,259	27,944	18,279	27,878	18,444	27,878	18,449	29,784	18,320
Illinois	21,371	22,043	21,208	21,791	21,212	21,589	21,208	21,383	21,208	21,222	21,202	21,010	19,936	19,536
Indiana	46,877	46,086	47,788	46,249	47,348	46,734	47,351	46,175	47,357	45,774	47,365	45,482	44,011	42,999
Iowa	18,307	19,440	16,532	17,135	16,532	16,848	16,532	16,207	16,532	16,174	16,532	16,172	14,055	14,570
Kansas	16,126	13,967	13,536	10,590	13,536	10,709	13,536	10,998	13,536	11,164	13,536	11,207	14,116	11,392
Kentucky	37,588	35,296	36,204	34,515	36,204	32,952	36,167	32,674	36,178	32,729	36,178	31,650	33,623	24,214
Louisiana	13,433	13,924	13,581	13,925	13,582	13,861	13,614	13,897	13,509	13,998	13,513	14,015	13,898	14,204
Maryland	7,179	7,540	7,285	7,540	7,285	7,276	7,284	7,248	7,164	7,141	7,164	7,141	6,781	6,911
Michigan	25,989	28,037	25,757	26,032	25,752	25,550	25,752	24,727	25,752	24,427	25,752	24,566	23,955	22,388
Mississippi	10,161	11,212	10,644	11,244	10,644	11,345	10,644	11,345	10,642	11,345	10,642	11,345	11,385	11,486
Missouri	23,156	23,759	22,762	23,299	22,762	22,136	22,762	21,073	22,762	20,679	22,762	20,072	18,284	17,430
New Jersey	3,440	3,668	3,377	3,684	3,377	3,661	3,382	3,652	3,383	3,646	3,383	3,646	4,396	3,287
New York	8,336	9,031	8,358	9,045	8,357	9,029	8,331	9,032	8,359	9,030	8,359	9,028	8,214	8,983
North Carolina	22,902	20,169	22,241	19,707	22,209	18,454	22,168	18,455	22,172	18,442	22,172	18,104	17,657	16,767
Ohio	42,274	41,327	40,114	39,081	40,136	36,890	40,063	37,792	39,907	37,674	39,867	36,758	27,779	29,813
Oklahoma	31,415	31,723	21,836	22,063	21,835	22,110	21,835	22,110	21,859	22,110	21,840	22,110	21,822	22,321
Pennsylvania	52,895	54,217	52,207	53,407	52,242	52,251	52,201	51,912	52,166	51,755	52,150	51,689	44,186	48,207
South Carolina	15,145	16,586	14,165	15,711	14,050	15,696	13,909	16,060	13,943	16,181	13,943	16,224	16,673	16,400
Tennessee	15,505	12,141	14,908	9,700	14,908	8,443	14,908	8,016	14,908	8,016	14,908	8,019	10,585	8,803
Texas	64,711	65,492	63,010	64,369	63,042	64,432	63,043	64,450	63,043	64,462	62,856	64,464	63,872	64,547
Virginia	15,148	15,339	14,437	15,387	14,449	14,823	14,452	15,250	14,458	14,930	14,452	14,946	11,721	13,712
West Virginia	26,464	27,099	25,418	27,014	25,434	24,475	25,283	23,291	25,092	23,655	25,092	24,364	17,932	22,778
Wisconsin	15,876	16,048	13,771	13,867	13,718	13,631	13,704	13,216	13,705	12,802	13,703	12,371	11,564	9,465
Total	654,161	647,439	612,348	600,802	611,565	589,319	610,731	585,429	610,174	583,803	609,910	580,839	567,009	547,167

<sup>\*</sup>Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions have been rounded to the nearest ton. These "final cost curve" runs have NO<sub>x</sub> and ozone season NO<sub>x</sub> cost thresholds at \$500/ton (all years), SO<sub>2</sub> Group 2 at \$500/ton (all years), and SO<sub>2</sub> Group 1 (2012-2013) at \$500/ton. The escalating cost thresholds identified in the column headers above only apply starting in 2014 for Group 1 SO<sub>2</sub> states. Costs are in 2007\$

Table B-4. 2012 & 2014 NO<sub>x</sub> EGU Emissions from all Fossil Units Greater than 25 MW at Escalating SO<sub>2</sub> Cost Thresholds from Final Cost Curve Analysis (Tons).

Gr. 4	Base	Case	\$5	00	\$1,0	600	\$2,3	300	\$2,8	300	\$3,3	300	\$10,	000
State	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	82,005	74,937	73,772	70,582	73,127	71,787	72,691	71,962	72,748	72,033	72,538	72,088	80,949	72,410
Georgia	66,384	47,808	61,601	40,349	62,014	40,425	62,010	40,540	61,948	40,706	61,421	40,742	66,945	40,743
Illinois	51,969	54,661	47,890	50,293	47,874	49,495	47,872	48,478	47,874	48,282	47,869	48,171	43,323	44,244
Indiana	119,625	116,552	110,396	107,081	109,790	109,291	109,726	108,424	109,642	107,305	109,592	106,426	101,584	99,243
Iowa	42,563	44,614	38,335	39,549	38,335	38,762	38,335	37,498	38,288	36,709	38,288	36,637	32,212	34,101
Kansas	37,106	32,390	30,714	24,379	30,714	24,782	30,714	25,560	30,714	25,779	30,714	25,811	32,312	26,063
Kentucky	88,136	83,481	85,200	81,786	85,124	77,999	85,086	77,238	85,034	76,974	84,905	73,977	72,916	56,152
Maryland	16,602	17,444	16,634	17,364	16,634	16,604	16,633	16,574	16,513	16,330	16,513	16,330	15,633	15,906
Michigan	60,594	64,345	60,200	60,541	60,193	59,135	60,193	57,812	60,193	57,677	60,193	57,562	55,437	51,034
Minnesota	36,833	37,952	29,573	30,377	29,571	31,021	29,572	31,345	29,573	31,354	29,529	31,350	30,986	31,818
Missouri	53,199	54,528	52,373	53,633	52,373	50,742	52,374	48,717	52,374	47,277	52,374	46,505	42,689	39,797
Nebraska	42,985	43,410	26,444	26,546	26,440	26,739	26,440	26,739	26,478	26,739	26,478	26,739	26,489	26,822
New Jersey	7,391	7,858	7,245	7,903	7,245	7,851	7,266	7,825	7,257	7,800	7,263	7,795	9,477	7,025
New York	17,556	18,505	17,536	18,547	17,534	18,531	17,543	18,549	17,569	18,544	17,574	18,542	17,119	17,951
North Carolina	51,902	46,130	50,960	44,897	51,020	41,916	50,587	41,553	50,586	41,049	50,587	40,040	39,839	37,982
Ohio	100,420	99,389	92,500	91,476	92,822	86,866	92,703	87,493	92,555	87,358	92,382	84,866	64,064	69,029
Pennsylvania	129,125	132,299	119,984	123,299	120,031	120,528	119,986	119,194	119,799	118,829	119,788	118,853	100,823	110,275
South Carolina	34,635	37,862	33,143	36,191	32,856	36,355	32,498	36,821	32,531	37,110	32,532	37,318	38,093	37,705
Tennessee	37,674	29,256	36,208	23,458	36,208	20,381	35,703	19,337	34,092	19,329	33,596	19,343	23,995	20,743
Texas	136,124	140,788	133,596	138,268	133,671	138,358	133,595	138,410	132,835	138,413	132,223	138,415	136,850	138,400
Virginia	34,567	35,798	33,133	35,607	33,156	34,790	33,242	34,903	33,246	34,606	33,011	34,704	26,351	31,083
West Virginia	61,792	64,182	59,606	63,625	59,622	56,738	59,472	54,582	59,280	55,301	59,280	56,565	40,804	52,565
Wisconsin	36,701	36,904	31,828	31,640	31,716	31,398	31,628	30,398	31,633	29,207	31,533	28,090	26,042	21,663
Total	1,345,888	1,321,093	1,248,871	1,217,391	1,248,070	1,190,494	1,245,869	1,179,952	1,242,762	1,174,711	1,240,183	1,166,869	1,124,932	1,082,754

<sup>\*</sup>Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions have been rounded to the nearest ton. These "final cost curve" runs have NO<sub>x</sub> and ozone season NO<sub>x</sub> cost thresholds at \$500/ton (all years), SO<sub>2</sub> Group 2 at \$500/ton (all years), and SO<sub>2</sub> Group 1 (2012-2013) at \$500/ton. The escalating cost thresholds identified in the column headers above only apply starting in 2014 for Group 1 SO<sub>2</sub> states. Costs are in 2007\$

Table B-5. 2012 & 2014 SO<sub>2</sub> EGU Emissions from all Fossil Units Greater than 25 MW at Escalating SO<sub>2</sub> Cost Thresholds from Final Cost Curve Analysis (Tons).

State	Base	Case	\$5	00	\$1,0	600	\$2,3	300	\$2,8	800	\$3,	300	\$10,	000
State	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	455,503	417,009	210,559	200,573	221,896	226,299	216,033	213,258	219,088	213,991	223,903	235,837	234,732	189,743
Georgia	405,933	169,702	157,474	94,105	158,455	94,142	158,527	95,231	159,484	95,484	158,022	94,946	174,898	97,942
Illinois	485,417	137,522	230,622	134,311	233,080	129,881	234,889	124,123	234,889	117,375	234,876	101,789	160,616	35,735
Indiana	776,359	711,265	285,584	245,191	294,517	178,525	285,424	161,111	285,099	152,954	282,070	120,532	159,737	69,382
Iowa	121,663	127,354	97,556	112,000	107,085	77,765	107,085	75,184	106,969	66,507	106,969	44,711	56,120	12,852
Kansas	68,490	69,767	41,528	55,250	41,528	57,372	41,528	60,811	41,528	61,193	41,528	61,360	45,235	45,465
Kentucky	520,531	487,990	176,229	160,567	185,426	126,374	189,335	106,284	189,830	102,868	191,235	88,755	75,486	45,958
Maryland	49,942	42,926	30,123	32,187	30,123	28,288	30,120	28,203	30,072	25,712	30,072	23,609	25,048	18,368
Michigan	252,411	265,611	194,537	206,173	194,537	188,646	194,537	143,995	194,537	105,223	194,537	93,569	115,742	23,884
Minnesota	64,524	66,268	41,981	43,336	41,981	45,191	41,981	45,638	41,981	45,628	41,880	45,618	43,119	44,257
Missouri	375,771	381,939	194,109	212,349	207,466	173,022	207,466	165,941	207,466	109,378	207,466	83,546	138,781	21,387
Nebraska	70,754	71,821	65,054	68,214	65,052	70,223	65,052	70,223	65,079	70,223	65,079	70,223	65,220	66,051
New Jersey	26,346	38,857	5,583	7,069	5,583	7,008	5,574	6,611	5,554	6,506	5,554	6,469	5,374	4,602
New York	51,243	40,416	20,550	20,657	20,578	20,037	20,497	11,823	20,515	10,928	20,515	9,871	14,917	8,105
North Carolina	144,554	120,441	117,658	103,780	134,827	60,725	136,881	57,620	136,942	48,683	136,942	40,047	35,412	30,440
Ohio	871,401	831,648	311,386	293,727	325,562	174,809	310,230	137,077	309,272	123,021	308,557	114,919	99,078	65,201
Pennsylvania	493,206	507,360	278,972	294,283	279,394	164,089	278,651	112,021	277,647	107,249	278,771	101,520	75,867	74,761
South Carolina	184,045	209,538	82,993	92,761	84,431	99,853	88,620	103,371	89,183	104,311	89,180	104,462	106,928	104,924
Tennessee	324,372	284,463	143,276	82,154	150,768	63,323	148,150	58,833	144,319	58,810	142,874	58,802	65,994	24,360
Texas	445,715	452,978	244,281	280,938	244,281	281,706	243,954	283,743	242,082	281,325	239,973	281,325	282,288	242,508
Virginia	80,889	64,917	70,810	58,969	70,820	50,806	70,820	35,057	70,758	33,380	69,647	31,563	18,870	15,963
West Virginia	535,586	497,398	146,239	157,335	148,095	121,751	146,174	75,668	144,206	74,373	143,472	71,505	47,973	55,246
Wisconsin	131,199	124,862	79,833	51,443	79,664	47,172	79,480	40,126	79,508	37,515	79,066	33,727	55,015	13,805
Total	6,935,854	6,122,052	3,226,937	3,007,372	3,325,149	2,487,007	3,301,008	2,211,952	3,296,008	2,052,637	3,292,188	1,918,705	2,102,450	1,310,939

<sup>\*</sup>Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions have been rounded to the nearest ton. These "final cost curve" runs have NO<sub>x</sub> and ozone season NO<sub>x</sub> cost thresholds at \$500/ton (all years), SO<sub>2</sub> Group 2 at \$500/ton (all years), and SO<sub>2</sub> Group 1 (2012-2013) at \$500/ton. The escalating cost thresholds identified in the column headers above only apply starting in 2014 for Group 1 SO<sub>2</sub> states. Costs are in 2007\$

Table B-6. 2012 & 2014 Transport Rule State SO<sub>2</sub> EGU Emission Total Used in AQAT Modeling (Tons)

		Base Case \$500		-	\$1,			300	l Oscu III	800		300	\$10.	000	
								,		,					
State	Group	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014	2012	2014
Alabama	2	455,825	417,340	210,886	200,905	222,223	226,634	216,360	213,593	219,414	214,326	224,230	236,172	235,074	190,078
Georgia	2	406,279	170,288	157,838	94,691	158,820	94,745	158,891	95,834	159,849	96,087	158,386	95,549	175,457	98,523
Illinois	1	489,140	141,606	235,127	138,815	237,585	134,386	239,393	128,997	239,393	122,249	239,381	106,945	165,772	40,892
Indiana	1	789,116	727,786	299,438	262,386	308,439	196,258	299,346	179,539	299,021	171,784	295,991	139,546	175,756	89,307
Iowa	1	127,102	133,083	102,989	117,830	112,450	83,661	112,450	81,137	112,334	72,460	112,334	50,664	64,589	23,429
Kansas	2	68,541	69,819	41,587	55,308	41,587	57,432	41,587	60,870	41,587	61,252	41,587	61,419	45,295	45,524
Kentucky	1	520,546	488,006	176,244	160,582	185,441	126,390	189,350	106,299	189,845	102,883	191,251	88,770	75,502	45,973
Maryland	1	49,942	42,926	30,123	32,187	30,123	28,288	30,120	28,203	30,072	25,712	30,072	23,609	25,048	18,368
Michigan	1	255,038	269,434	197,385	210,163	197,384	192,884	197,380	148,232	197,380	109,506	197,380	97,932	120,259	29,350
Minnesota	2	67,816	70,937	45,321	47,720	45,300	49,589	45,300	50,213	45,300	50,203	45,199	50,193	46,972	49,281
Missouri	1	383,314	390,287	201,504	221,689	214,803	182,508	214,803	175,480	214,861	118,917	214,861	93,085	149,341	41,805
Nebraska	2	71,905	73,073	66,204	69,466	66,203	71,475	66,203	71,475	66,230	71,475	66,230	71,475	66,371	67,303
New Jersey	1	26,346	38,857	5,583	7,069	5,583	7,008	5,574	6,611	5,554	6,506	5,554	6,469	5,374	4,602
New York	1	56,461	42,887	26,006	23,181	26,041	22,618	25,960	14,404	25,735	13,399	25,735	12,342	20,095	10,588
North Carolina	1	148,606	126,048	122,063	109,612	139,232	66,643	141,263	63,577	141,311	54,717	141,311	46,081	40,187	36,326
Ohio	1	882,559	851,199	327,015	313,193	341,192	202,443	325,375	166,691	324,417	153,471	323,702	145,431	130,251	98,812
Pennsylvani a	1	495,463	509,650	281,272	296,596	281,681	166,402	280,938	114,431	279,934	109,658	281,058	103,929	78,272	77,170
South Carolina	2	186,355	213,281	85,479	96,504	86,917	103,596	91,106	107,114	91,669	108,055	91,666	108,660	109,715	109,122
Tennessee	1	324,377	284,468	143,281	82,159	150,773	63,328	148,155	58,838	144,324	58,815	142,879	58,807	66,001	24,366
Texas	2	446,006	453,332	244,613	281,298	244,613	282,066	244,287	284,132	242,414	281,721	240,305	281,721	282,685	242,905
Virginia	1	92,468	77,256	83,019	71,505	83,029	63,367	83,029	47,639	82,772	45,962	81,661	44,145	31,527	28,545
West Virginia	1	536,695	498,507	147,349	158,445	149,205	122,860	147,284	76,778	145,315	75,483	144,582	72,615	49,083	56,356
Wisconsin	1	135,828	130,538	85,168	57,418	85,110	53,147	84,925	46,205	84,895	43,585	84,453	39,797	60,984	19,431
Total		7,015,727	6,220,607	3,315,495		3,413,731	2,597,726			·	2,168,226	3,379,807	2,035,357	2,219,608	1,448,054

\*Source: Integrated Planning Model run by EPA, 2011. See Appendix A for list and description of these IPM runs. Emissions are shown for all fossil and biomass units. These "final cost curve" runs have NO<sub>x</sub> and ozone season NO<sub>x</sub> cost thresholds at \$500/ton (all years), SO<sub>2</sub> Group 2 at \$500/ton (all years), and SO<sub>2</sub> Group 1 (2012-2013) at \$500/ton. The escalating cost thresholds identified in the column headers above only apply starting in 2014 for Group 1 SO<sub>2</sub> states. Costs are in 2007\$

#### C. Analysis of Significant Contribution Using the Air Quality Assessment Tool

In defining significant contribution to nonattainment and interference with maintenance using the multi-factor test (described in section VI.D of the preamble) based on both cost and air quality factors, a key quantitative input is the predicted downwind ambient air quality impacts of upwind EGU emission reductions under the SO<sub>2</sub> cost thresholds. Time and resource limitations (in particular the amount of time needed to set up, run the CAMx model, and analyze the results for a single model run) precluded the use of air quality modeling for all but a few emissions scenarios. Because EPA needed to evaluate emission reductions under several different SO<sub>2</sub> cost thresholds, it was not possible to use CAMx air quality modeling to evaluate all cases

EPA thus uses a simplified air quality assessment tool (AQAT), to estimate the downwind air quality impacts from various different SO<sub>2</sub> cost thresholds. For the SO<sub>2</sub> cost thresholds, the state-by-state EGU emissions are projected using EPA's IPM model under a given cost threshold of emission reductions (see section B of this TSD for details about the IPM model runs and for the emission projections). The air quality impacts of these cost thresholds are then estimated using AQAT. The simplified tool allows the Agency to analyze many more SO<sub>2</sub> cost thresholds than would otherwise be possible. The remainder of section C of this document will:

- Present an introduction and overview of AQAT;
- Describe the construction of AQAT;
- Provide the results of the SO<sub>2</sub> cost threshold analyses;
- Compare the AQAT estimates and CAMx results of sulfate and total PM<sub>2.5</sub> for two emissions scenarios where CAMx modeling was performed (i.e., the 2014 base case and 2014 remedy); and
- Depict the results of an analysis of emissions "leakage" for 2012 performed using AQAT.

#### 1. Introduction: Use and development of the air quality assessment tool.

AQAT was developed specifically for use in the Transport Rule significant contribution analysis. EPA described AQAT in detail in the proposed Transport Rule and took comment on the tool. For this final rule, EPA refined both the construction and application of AQAT. Significant changes made since proposal and in response to comments include:

- Reliance on CAMx modeling for the evaluation of downwind ozone concentrations and the nitrate component of ambient PM<sub>2.5</sub> (i.e., AQAT was not used to estimate air quality changes due to emission changes in NO<sub>x</sub>);
- Calibration of AQAT's predicted change in sulfate concentrations to change in SO<sub>2</sub> emissions using CAMx. This calibration is receptor-specific and is based on the changes in SO<sub>2</sub> emissions and resulting sulfate concentrations between the 2012 base case and an AQAT calibration scenario<sup>2</sup> in 2014 (for more details about this scenario, see the footnote and the brief description below).

 $<sup>^2</sup>$  An integral input to the creation and use of AQAT was CAMx air quality modeling of the AQAT calibration scenario. This scenario was created prior to the development of AQAT for the final Transport Rule and it's EGU emissions modeling reflects the geography and cost thresholds from the preferred remedy of the proposed Transport Rule. Specifically, this scenario uses IPM to model cost thresholds of \$500/ton for annual and ozone-season  $NO_x$  for states proposed to be regulated for  $PM_{2.5}$  and ozone

- Use of seasonal contributions, and seasonal relative response factors, in developing the relationship between upwind SO<sub>2</sub> reductions and downwind 24-hour PM<sub>2.5</sub> concentrations; and
- Application of these seasonal relative response factors to the CAMx modeled 2003-2007 24-hour PM<sub>2.5</sub> values for the 2012 base case. This methodological change allows EPA to the recalculate the 98th percentile 24-hour PM<sub>2.5</sub> concentration and estimates of the average and maximum design values at each SO<sub>2</sub> cost threshold for 2014.

As described in section VI.B of the preamble, EPA determined that the \$500/ton threshold for upwind annual and ozone-season NO<sub>x</sub> control is appropriate for the final Transport Rule. Because this threshold corresponds to the NO<sub>x</sub> control strategy modeled in the AQAT calibration scenario, EPA relied on CAMx modeling of this scenario for the ozone assessment of the final Transport Rule and did not create an ozone AQAT. Additionally, EPA relied on CAMx modeling of the AQAT calibration scenario for the nitrate estimate for the annual and 24-hour PM<sub>2.5</sub> assessments for the final Transport Rule. Specifically, EPA used this CAMx modeled nitrate estimate for each SO<sub>2</sub> cost threshold analyzed. EPA created and used two separate versions of AQAT (annual and 24-hour PM<sub>2.5</sub>) to estimate the impact of the upwind SO<sub>2</sub> emission reductions on downwind ambient sulfate concentrations for the two NAAQS, respectively. For both versions, the sulfate estimates were combined with CAMx estimates of nitrate and other pollutant species from the AQAT calibration scenario to estimate concentrations of total PM<sub>2.5</sub> for the two NAAQS, respectively. Most of the steps used construction of annual and 24-hour PM<sub>2.5</sub> AQAT are the same. Consequently, when EPA refers to a single AQAT, the description applies to both the annual and 24-hour versions of the tool. Step-by-step descriptions of these tools are found in section C.2 of this document. Where differences in the construction of the tools are present, the differences are described.

A critical factor in AQAT is the establishment of a relationship between  $SO_2$  emission reductions and reductions in downwind sulfate. For the purposes of developing and using AQAT to compare the air quality impacts of  $SO_2$  emission reductions under various  $SO_2$  cost thresholds, we assume that there is a relationship between changes in emissions and changes in sulfate contributions on a receptor-by-receptor basis. Specifically, EPA assumes that within the range of total  $SO_2$  emissions being considered (as defined by the  $SO_2$  cost thresholds), a change in  $SO_2$  emissions leads to a proportional change in downwind sulfate contributions.

Within AQAT, the relationships between upwind emissions and downwind air quality are defined using the 2012 base case contribution air quality modeling and a 2014 AQAT calibration scenario<sup>2</sup>. As described in the Air Quality Modeling Final Rule TSD, CAMx air quality modeling with state-by-state source-apportionment of emissions established a relationship between SO<sub>2</sub> emissions from each upwind state and the estimated air quality impact from that state to each downwind air quality monitor for the 2012 base case emission scenario. For example, from the output of the CAMx source apportionment modeling, we know the annual average sulfate contribution at a downwind monitor resulting from the specific SO<sub>2</sub> emissions in the 2012 base case from a particular upwind state. Similarly, we also know the sulfate contribution in each of the quarters in the year (resulting from the quarterly SO<sub>2</sub> emissions). In AQAT, we associate a change in emissions from that upwind state with a particular change in its downwind contribution. In "uncalibrated" AQAT, for example, we assume that a 20% decrease in the upwind state's emissions led to

respectfully in the proposed Transport Rule;  $$500/\text{ton for SO}_2$ in PM<sub>2.5</sub> Group 2 states from the proposed Transport Rule; and <math>$2,000/\text{ton for SO}_2$ in PM<sub>2.5</sub> Group 1 states from the proposed Transport Rule. Note that the geography and SO<sub>2</sub> cost thresholds for this scenario differ from the geography and SO<sub>2</sub> cost thresholds for the final Transport Rule. For more details on this scenario please refer to the Air Quality Modeling Final Rule TSD.$ 

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a 20% decrease in its downwind contribution. This relationship was then calibrated for use in the final AQAT by calculating the relationship between the relative change in PM<sub>2.5</sub> sulfate at each receptor using CAMx air quality modeling and the relative change in PM<sub>2.5</sub> sulfate at each receptor using AQAT based on emission reductions from the 2012 base case to the 2014 AQAT calibration scenario. This AQAT calibration scenario, as described further in the Air Quality Modeling Final Rule TSD, reflected SO<sub>2</sub> and NO<sub>x</sub> emission reductions of similar stringency and from the same geography as the Transport Rule proposal. Because of this relationship, it was possible to calibrate AQAT's PM<sub>2.5</sub> sulfate response for use in assessing sulfate under various SO<sub>2</sub> cost thresholds. This is described further in section C.2 of this document. Using the example above, where a 20% reduction in emissions resulted in a 20% decrease in contribution, in "calibrated" AQAT, the 20% emission reduction leads to a 15% concentration reduction (a ratio derived directly from the emission reduction and concentration change from the 2012 base case to the 2014 AQAT calibration scenario).

As was done for the proposal, AQAT applies a linear relationship<sup>3</sup> between reductions in upwind SO<sub>2</sub> emissions and air quality improvements at downwind monitors. However, for the final Transport Rule, this relationship is now calibrated for the the range of emission reductions examined by EPA and no longer relies on an assumption that at zero upwind emissions there is zero downwind concentration to calculate the response.

In the application of AQAT, we assume that the reduction of a ton of emissions of SO<sub>2</sub> from the upwind state has an equivalent air quality effect downwind (on an air quality impact per ton basis), regardless of source sector or the location of the particular emission source within the state where the ton was reduced. For example, reducing one ton of SO<sub>2</sub> emissions from the power sector is assumed to have the same downwind sulfate reduction as reducing one ton of SO<sub>2</sub> emissions of from the mobile source sector. Commenters on the proposed Transport Rule suggested that EPA develop sector-specific contribution factors for use in AQAT. However, the AQAT was developed based on modeling information that was available because it was used in other parts of the Transport Rule. Developing these sector-specific factors would require sector-based source tagging, requiring significant additional air quality modeling resources to complete - resources already limited (as described above).

While less rigorous than the air quality models used for attainment demonstrations, EPA has established that AQAT is a cost-effective tool for estimating the downwind sulfate reductions due to upwind SO<sub>2</sub> emission reductions for the air quality input to the multi-factor test for the final Transport Rule. The evidence substantiating this is found in section C.4 in this TSD. Here, EPA presents comparisons of AQAT estimates and CAMx modeling results for sulfate and total PM<sub>2.5</sub> for the 2014 base case and the 2014 final

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 $<sup>^3</sup>$  As described in the proposed Transport Rule Analysis to Quantify Significant Contribution TSD, understanding the relationship between emissions and air quality involves looking at some of the chemical reactions involved in the formation of  $PM_{2.5}$ .  $PM_{2.5}$  concentration is comprised of several chemical species including related forms of particulate sulfate and particulate nitrate. The atmospheric chemical reactions that convert  $SO_2$  to particulate sulfate are central to understanding the relationship between emissions and particulate formation. Both gas-phase and aqueous-phase processes can be important in the formation of particulates.

In both phases, the reaction is presumably dependent on complex effects from oxidants, possibly leading to a nonlinear response in sulfate formation (particularly for the aqueous phase). In the gas phase, the reaction depends on hydroxyl radical (OH) concentrations, which depend indirectly on  $NO_X$  and VOC concentrations, as well as sunlight intensity. In the aqueous phase, the rate of formation in solution is dependent on oxidants in solution such as  $H_2O_2$  and  $O_3$ . During certain times and situations, such as the winter months when H2O2 concentrations may be low and  $SO_2$  concentrations are high, the response in sulfate formation may be nonlinear. Some of the factors and reagents (among others) affecting the reactions include  $NH_3$ ,  $NO_X$  and VOC concentrations, sunlight intensity, and temperature. (Atmospheric Chemistry and Physics: From Air Pollution to Climate Change (2nd Edition). 2006. John H. Seinfeld & Spyros N. Pandis. Published by John Wiley & Sons, Inc., Hoboken, New Jersey).

The air quality assessment tool was not designed or intended to account for the non-linear relationships between emissions and air quality. In contrast to the assessment tool, the CAMx modeling explicitly accounts for interactions and nonlinearities in the atmospheric reactions, the effects of transport and diffusion, and the uneven geographic distribution of sources and controls across a state.

Transport Rule. Since, these CAMx modeling runs were not used in the development or calibration of AQAT, and span a wide range of EGU  $SO_2$  emission levels, successful comparisons against these independent data sets indicates that AQAT estimates for other  $SO_2$  emission levels can be used. EPA finds that AQAT's estimates of sulfate and total  $PM_{2.5}$  design values are closely correlated with the CAMx modeling results for both the 2014 base case and 2014 final Transport Rule. As shown in Figures C-1, C-2, and C-3, the slopes of the least squares linear regression equations are equal to 1.0 (+/- 0.02), with  $R^2$  values larger than 0.99 for all cases except annual  $PM_{2.5}$ , where  $R^2$  is 0.95.

As described above, and in more detail in C.2, EPA utilized CAMx modeling results from the AQAT calibration scenario for the estimates of nitrate and other (non-sulfate) PM<sub>2.5</sub> components for all SO<sub>2</sub> cost thresholds assessed including the AQAT simulation of the 2014 base case (base case SO<sub>2</sub> emissions from EGUs are described in section B). Therefore, the nitrate and other PM<sub>2.5</sub> components in the AQAT base case are reflective of the response in these components to the emission reductions modeled in the AQAT calibration scenario. The AQAT 2014 base case was useful in providing a comparison point between AQAT and CAMx for sulfate and PM<sub>2.5</sub>. Additionally, the AQAT simulation of the 2014 base case was useful in providing a reference point for comparing the relative improvement in PM<sub>2.5</sub> design values under the SO<sub>2</sub> cost thresholds assessed.

Section C.2, below, is a technical explanation of the construction of AQAT. Readers who prefer to access the results of the analysis using the AQAT tool are directed to section C.3. Comparisons between AQAT and the CAMx modeling for the 2014 base case and the 2014 remedy can be found in section C.4

#### 2. Details on the construction of the air quality assessment tool.

#### (a) Overview of AQAT.

This section describes the step-by-step development process for AQAT. In AQAT, we link state-by-state modeling of SO<sub>2</sub> emission reductions (from IPM), available at different cost thresholds, with CAMx modeled SO<sub>2</sub> emissions to sulfate contributions in order to predict resulting air quality contributions to selected downwind receptors. Receptors were selected by determining which monitors CAMx predicted to have non-attainment or maintenance problems with the annual or 24-hour PM<sub>2.5</sub> standard for the 2012 base case. The reduction in sulfate contributions and resulting air quality improvement were then considered in a multi-factor test for defining significant contribution and interference with maintenance. In the analysis of a given receptor, only states that were "linked" to that receptor (i.e., contributed an air quality impact at or above the 1 percent -- of the NAAQS standard -- air quality threshold) as well as the state that contained that receptor (regardless of that state's contribution) were assumed to make reductions from the base case emissions level. For a discussion of the 1% threshold, see section V.D of the preamble.

Specifically, the key estimates from AQAT for each receptor are:

- The sulfate contribution as a function of emissions at each cost threshold, for each upwind state that is contributing above the 1 percent air quality threshold and the state containing the receptor.
- The sulfate contribution under base case SO<sub>2</sub> emissions, for each upwind state that is not above the 1 percent air quality threshold for that receptor. These base level emissions may be reduced in future years (i.e., 2014) compared to the 2012 base case level due to EGU, mobile source, and other source-sector reductions.
- The non-sulfate contribution under emissions modeled for the AQAT calibration scenario.

The results of the analysis using AQAT can be found in section C.3 of this document.

#### (b) Data needed to construct AQAT for the final Transport Rule.

Several data sources were needed to construct the calibrated AQAT for the final Transport Rule. Three data sources provide the necessary initial information to construct the uncalibrated versions of annual and 24-hour PM<sub>2.5</sub> AQAT. The uncalibrated versions of AQAT for annual and 24-hour PM<sub>2.5</sub> were used to create AQAT estimates of sulfate response under SO<sub>2</sub> and NO<sub>x</sub> emissions defined by the AQAT calibration scenario. The datasets required to construct the annual and 24-hour versions of AQAT included: the 2012 base case SO<sub>2</sub> emission inventories from all source sectors used in the source apportionment CAMx air quality modeling; the CAMx 2012 source apportionment air quality modeling (contributions) for each upwind state to each downwind receptor; and the 2014 AQAT calibration scenario SO<sub>2</sub> emissions inventories from all source sectors. An additional dataset, 2014 sulfate results from CAMx for the AQAT calibration scenario, allows EPA to compare the AQAT sulfate results of this scenario against the air quality modeling results, and develop calibration factors. These calibration factors were then used to create a "calibrated" AQAT. Finally, EGU SO<sub>2</sub> emissions (from IPM) at each cost threshold assessed provided the final dataset to generate AQAT air quality results using calibrated AQAT. The base case emissions inventories for 2012 and 2014, as well as the CAMx 2012 source apportionment air quality modeling results are discussed in preamble sections V.C and V.D, respectively. The EGU emissions for each cost threshold (projected using IPM) including the base case are listed in Table B-6 and described in section B of this TSD. To construct the annual PM2.5 version of AQAT, the emissions and CAMx air quality modeling estimates were at an annual time-scale. To construct the 24-hour PM2.5 version of AQAT, both the emissions and CAMx air quality modeling estimates were at a quarterly time-scale.

As described in section C.2.(c).5. of this TSD, for estimating the design values in the 24-hour PM<sub>2.5</sub> version of AQAT, an additional data set was necessary, the PM2.5 components (including sulfate) for 8 days in each quarter for each year between 2003-2007 projected to the 2012 base case and the 2014 AQAT calibration scenario case.

As described in the Air Quality Modeling Final Rule TSD and section V.D of the preamble, the air quality contributions and emissions were modeled for the following 38 states: Alabama, Arkansas, Connecticut, Delaware, District of Columbia<sup>4</sup>, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, West Virginia, and Wisconsin. Thus, in AQAT, these states had the possibility of making reductions in emissions leading to changes in air quality contributions at the downwind receptors. Additionally, due to the modeling domain, AQAT is only able to estimate changes in PM<sub>2.5</sub> concentrations from monitors within these states. AQAT does not quantify contributions from states outside the CAMx modeling domain. Therefore, the contributions and emissions from all other states were assumed to be invariant.

#### (c) Detailed outline of the process for constructing the AQAT for the final approach.

The annual and 24-hour  $PM_{2.5}$  versions of AQAT were created and used in a multi-step process. First, annual and 24-hour  $PM_{2.5}$  versions of AQAT were created specifically for calibration. As described in the following paragraphs, the 24-hour version of AQAT simulated each of four quarters in the year to represent

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<sup>&</sup>lt;sup>4</sup> Maryland was treated as a separate state in this analysis, rather than as combined with the District of Columbia. Its emissions were totaled separately and the changes in emissions occurring at different marginal costs were applied to upwind contributions from Maryland alone.

seasonal differences in SO<sub>2</sub> to sulfate formation. Next, the relative sulfate response from AQAT was calibrated to the sulfate response from CAMx using the change in emissions from the 2012 base case to the 2014 AQAT calibration scenario. This was done on an annual basis for the annual PM<sub>2.5</sub> version of AQAT and on a quarterly basis for the 24-hour PM<sub>2.5</sub> version of AQAT. Next, the calibrated annual and 24-hour versions of AQAT were used to evaluate the sulfate response of emission reductions for each SO<sub>2</sub> cost threshold assessed. For the annual PM2.5 AQAT, at each cost threshold, the sulfate values were combined with other PM<sub>2.5</sub> constituents from the AQAT calibration scenario resulting in estimated annual PM2.5 design values. An additional step was necessary in the 24-hour PM<sub>2.5</sub> AQAT to calculate design values, which was to project the adjusted sulfate change in each quarter to the representative modeled "days<sup>5</sup>" in each quarter using relative response factors. For each day, the other PM<sub>2.5</sub> constituents were added using the estimates from the AQAT calibration scenario. For the 24-hour AQAT, for each projected year (2003-2007), the 98<sup>th</sup> percentile value was selected. The 98<sup>th</sup> percentile values were then used to predict 2014 design values for 24-hour PM<sub>2.5</sub>. This section describes the details behind these steps.

One key difference between the way in which AQAT was used in the analysis for the proposed Transport Rule and the way it was used in the analysis for the final Transport Rule is the creation of 4 quarterly specific components of the 24-hour version of AQAT for estimating seasonal responses for 24-hour PM<sub>2.5</sub> assessments. Following public comment on the CAMx air quality estimates from the proposal and the comparison with the AQAT estimates from the proposal, EPA conducted further analysis that demonstrated seasonal differences in the PM<sub>2.5</sub> response to SO<sub>2</sub>/NO<sub>x</sub> emission reductions. EPA determined that creating 4 AQATs to assess the quarterly response of downwind sulfate to upwind SO<sub>2</sub> reductions would be beneficial in adequately accounting for seasonal differences in the relationship between emissions and sulfate formation. Quarters were determined based on calendar year (i.e. January, February, and March were quarter 1; April, May, and June were quarter 2; July, August, and September were quarter 3; and October, November, and December were quarter 4). Each quarterly AQAT was based on quarterly specific emissions and contributions from CAMx 2012 source apportionment modeling and quarterly specific calibration factors were developed (described later). As a "proof of concept", EPA developed and evaluated quarterly AQATs, using the air quality modeling from the proposal. Following successful evaluation, EPA utilized the approach for the final Transport Rule.

The AQAT calibration scenario played a key role in calibrating AQAT for use in the final Transport Rule. The intent of this scenario was to create a calibration point within the range of all emission reductions examined by EPA using AQAT. This calibration point was used to create site-specific calibration factors so that the response of sulfate concentrations to upwind SO<sub>2</sub> emission changes would more-closely align with sulfate estimates from CAMx. To fill this role, EPA used the results of IPM modeling of a control scenario with similar level and geographic distribution to the preferred remedy from the proposed Transport Rule. Selection of this AQAT calibration scenario was not an indication of the level of SO<sub>2</sub> reduction that would be achieved by the final Transport Rule. This scenario only served to develop the calibration points for AQAT which allowed EPA to reasonably assess the downwind impacts of SO<sub>2</sub> reductions both more and less stringent than the AQAT calibration scenario.

In order to facilitate understanding of this process, EPA is including an example monitor for evaluation in this text: monitor number 261630033 in Wayne County, Michigan, with a 2012 base case predicted 24-hour  $PM_{2.5}$  average design value of 39.48  $\mu g/m^3$  and maximum design value of 39.82  $\mu g/m^3$ . Additional details for all monitors can be found in the referenced tables in the docket.

#### (1) Create uncalibrated annual and quarterly AQATs for calibration

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<sup>&</sup>lt;sup>5</sup> 8 days were simulated in each quarter, for a total of 32 days per year. 32 days were mapped to each year over the 2003-2007 time frame and projected to the 2012 or 2014 year.

To create the annual and quarterly PM<sub>2.5</sub>AQATs for calibration, EPA used emissions and contributions to estimate the change in predicted sulfate due to SO<sub>2</sub> emission reductions under the AQAT calibration scenario. These "uncalibrated" AQATs are directly comparable to those from the proposed Transport Rule.

First, EPA calculated annual and quarterly state-level 2012 base case total SO<sub>2</sub> emissions from all source sectors. These emissions estimates were used for the CAMx 2012 source apportionment modeling. This emissions data is divided into multiple source sectors for the purposes of air quality modeling: power sector point (from IPM), non-power sector point, non-point, onroad, nonroad, C3 marine, alm, and fires (see the Air Quality Modeling Final Rule TSD for additional details on the emissions inventories used in the CAMx air quality modeling). The state-level total SO<sub>2</sub> emissions are the sum of emissions from all these source sectors. Next, EPA calculated the annual and quarterly state-level 2014 total SO<sub>2</sub> emissions across all source sectors for the AQAT calibration scenario. EPA calculated the ratio of 2014 total SO<sub>2</sub> emissions for the AQAT calibration scenario to 2012 total SO<sub>2</sub> emissions for the 2012 base case for each state modeled in CAMx. More information on the emissions inventories can be found in preamble section IV.C. The total emissions data and resulting ratios can be found in Table C-1.

For each monitor, the uncalibrated annual and quarterly 2014 contribution of sulfate from each state for the AQAT calibration scenario is calculated by subtracting the estimated change in concentration from the 2012 base case contribution. The change in concentration is found by multiplying the 2012 base case sulfate contribution by the difference in the ratio of emissions. The difference in the ratio of emissions is calculated as 1 minus the ratio of total SO<sub>2</sub> emissions in the AQAT calibration scenario to the 2012 base case scenario. When the change in concentration is subtracted from the base case contribution, the net result is the uncalibrated estimated sulfate contribution from each state for the AQAT calibration scenario.

For each monitor, these state-level contributions are then summed to estimate total sulfate contribution from the states in the CAMx modeling domain. Finally, "other" modeled sulfate contributions ("BIOG", "OTHER", "ICBC", and "SOA") are added to the annual and quarterly total to account for sources of sulfate outside the CAMx modeling domain. The grand sulfate total from all the states and "other" contributions represents the total sulfate component of PM<sub>2.5</sub> estimated by uncalibrated AQAT for the AQAT calibration scenario. It is the ratio of the CAMx to AQAT sulfate components for this AQAT calibration scenario that becomes the constant calibration factor used in "calibrated" AQAT.

Table C-1. 2012 Base Case and 2014 AQAT Calibration Scenario Ammonium Sulfate Contributions for Monitor Number 261630033 in Wayne County, Michigan, as well as Total SO<sub>2</sub> Emissions from all Source-Sectors for Each State.

State/Source	2012 Base Case Quarter 2 Sulfate Contributions (μg/m³)	2012 Base Case Quarter 2 SO <sub>2</sub> Emissions (tons)	2014 AQAT calibration Scenario Quarter 2 SO <sub>2</sub> Emissions (tons)	Ratio of 2014 AQAT calibration Scenario Emissions to 2012 Base Case SO <sub>2</sub> Emissions	Estimated 2014 Contribution of Sulfate in Quarter 2 (uncalibrated AQAT) (µg/m³)
AL	0.50	133,175	84,803	0.64	0.32
AR	0.14	30,280	34,229	1.13	0.16
CT	0.00	4,599	4,628	1.01	0.00
DE	0.01	2,440	2,145	0.88	0.01
DC	0.00	499	485	0.97	0.00
FL	0.06	60,947	63,051	1.03	0.06
GA	0.21	128,332	46,991	0.37	0.08
IL	1.21	141,050	58,995	0.42	0.51
IN	3.09	223,451	77,561	0.35	1.07
IA	0.12	48,675	34,918	0.72	0.08
KS	0.06	26,869	24,901	0.93	0.05
KY	1.89	135,520	42,304	0.31	0.59
LA	0.23	59,724	58,568	0.98	0.22
ME	0.00	5,967	4,744	0.79	0.00
MD	0.11	29,347	25,558	0.87	0.10

MA	0.01	10,663	10,850	1.02	0.01
MI	3.93	85,280	60,550	0.71	2.79
MN	0.03	26,684	22,243	0.83	0.03
MS	0.06	15,408	15,954	1.04	0.06
MO	0.86	114,219	71,433	0.63	0.54
NE	0.02	19,586	18,871	0.96	0.02
NH	0.00	2,747	3,482	1.27	0.00
NJ	0.02	11,115	7,292	0.66	0.01
NY	0.12	51,969	33,122	0.64	0.08
NC	0.14	55,881	34,548	0.62	0.09
ND	0.03	28,083	28,235	1.01	0.03
ОН	3.56	237,608	66,535	0.28	1.00
OK	0.08	39,479	38,672	0.98	0.08
PA	0.80	149,123	57,087	0.38	0.30
RI	0.00	1,316	1,315	1.00	0.00
SC	0.03	58,121	36,711	0.63	0.02
SD	0.01	9,341	9,282	0.99	0.01
TN	0.73	100,713	38,227	0.38	0.28
TX	0.18	174,356	184,266	1.06	0.19
VT	0.00	1,469	1,473	1.00	0.00
VA	0.15	42,859	31,049	0.72	0.11
WV	1.02	140,798	29,254	0.21	0.21
WI	0.09	49,290	28,540	0.58	0.05
BIOG	0.00			1	0.00
OTHER	0.91			1	0.91
ICBC	1.14			1	1.14
SOA	0.00			1	0.00
Total Sulfate Component of PM <sub>2.5</sub> in Quarter 2	21.54				11.21

## (2) Calibrate annual and quarterly sulfate response in AQAT using CAMx modeling of 2012 base and 2014 AQAT calibration scenario

Next, the estimate of the monitor specific sulfate responses under the AQAT calibration scenario was used to calibrate the AQATs to CAMx for the annual and quarterly versions. First, the annual and quarterly changes in sulfate predicted by AQAT and CAMx relative to 2012 base case concentrations were calculated for each monitor. To calculate this for AQAT and CAMx independently, EPA subtracted the 2014 total sulfate estimated by either AQAT or CAMx for the AQAT calibration scenario from the respective 2012 total sulfate predicted by CAMx for the 2012 base case. This difference was then divided by the 2012 total sulfate predicted by CAMx for the 2012 base case (see Table C-2 for an example calculation). The calculation of these monitor-specific calibration factors provided EPA with the ability to align the sulfate response predicted by AQAT to the sulfate response predicted by CAMx at a level of SO<sub>2</sub> reductions that EPA expected to be in the vicinity of the final Transport Rule remedy.

For 24-hour PM<sub>2.5</sub>, the CAMx estimates of the 2012 base case and 2014 AQAT calibration scenario are presented by year as well as by quarter. Thus, for each quarter, there are five values (one for each year from 2003-2007 projected to the future year). In contrast, the estimates from AQAT are the average of the five values. The AQAT and CAMX ammonium sulfate factors for 24-hour PM<sub>2.5</sub> can be found in the "Daily

PM Calibration Factors.xlsx" excel workbook on worksheet "AQModeling Calib Factor DailyPM" in columns BA and AJ, respectively. The calibration factor is the ratio of the CAMx response factor divided by the uncalibrated AQAT response factor. This calibration factor can be found in column BC of the aforementioned excel worksheet.

For annual PM<sub>2.5</sub>, the CAMx estimates used in AQAT construction are represented as 5-year averages. The AQAT and CAMX ammonium sulfate factors for annual PM<sub>2.5</sub> can be found in the "Annual PM Calib Factors.xlsx" excel workbook on worksheet "AQModeling Calib Factors Ann PM" in columns AI and AE, respectively. The calibration factor is the ratio of the CAMx response factor divided by the uncalibrated AQAT response factor. This calibration factor can be found in column AK of the aforementioned excel worksheet.

Generally, for similar emission reductions, the sulfate reductions predicted by CAMx for the "warm" seasons (i.e., 2nd and 3rd calendar quarters) were greater than during the "cool" seasons (i.e., 1st and 4th quarters). Consequently, the calibration factors for the "warm" seasons are larger than they are for the "cool" seasons.

Table C-2. Total Estimated Sulfate Contributions in the 2012 Base Case and 2014 AQAT Calibration Scenario from CAMx and Uncalibrated AQAT for Monitor Number 261630033 in Wayne County, Michigan (See Table C-1) for 24-hour PM<sub>2.5</sub>. These Values are then Used to Create a Calibration Factor.

	2012 Base Case Quarter 2 Sulfate Contributions (μg/m³)	Estimated 2014 Contribution of Sulfate in Quarter 2 (uncalibrated AQAT) (µg/m³)	Estimated Quarter 2 Reduction Divided by 2012 Base Case Concentration
CAMx (Response For 2003 Projected to 2012 or 2014)	22.67	13.21	0.4172
AQAT (Response From The Average Contributions)	21.54	11.21	0.4795
Calibration Factor - Response Factor From CAMx Divided By Response Factor From AQAT			0.8700

#### (3) Create calibrated annual and quarterly AQATs for cost threshold analysis

Next, EPA created the annual and quarterly PM<sub>2.5</sub> calibrated AQATs for cost threshold analysis. EPA used emissions, air quality sulfate contribution factors, and calibration factors to estimate the change in predicted sulfate due to SO<sub>2</sub> emission reductions under each cost threshold evaluated. First, as described in step 2, EPA calculated annual and quarterly state-level 2012 base case total SO<sub>2</sub> emissions. Next, EPA calculated the annual and quarterly state-level 2014 total SO<sub>2</sub> emissions across all source sectors for the cost thresholds. This total is the sum of IPM predicted SO<sub>2</sub> emissions from power sector point sources in 2014 and the predictions of 2014 base case SO<sub>2</sub> emissions from all other source sectors. Note, IPM estimates of SO<sub>2</sub> emissions are available annually only. In order to approximate the quarterly emissions needed for the 24-hour

AQAT, EPA multiplied the annual emissions at each cost threshold for each state by the ratio of the state's quarterly to annual emissions for the power sector from SMOKE modeling of the AQAT calibration scenario. For example, the ratio for quarter one is the sum of the emissions for January, February, and March divided by the total annual emissions. EPA calculated the ratio of 2014 total SO<sub>2</sub> emissions for each cost threshold to 2012 total SO<sub>2</sub> emissions for the 2012 base case for each state modeled in CAMx. More information on the emissions inventories can be found in preamble section IV.C. This emissions data and resulting ratios for the second quarter for 24-hour PM<sub>2.5</sub> under the AQAT calibration scenario can also be found in Table C-1.

For each cost threshold level analyzed, on a receptor-by-receptor basis, the emissions reductions for each upwind state are associated with one of two cost threshold levels (either the base case emissions level or the particular threshold cost level being analyzed) depending on whether the upwind state is "linked" to that receptor. States that are contributing above the air quality threshold (i.e., 1 percent contribution of total sulfate and nitrate for the annual and 24-hour PM<sub>2.5</sub> AQAT) to the monitor, as well as the state containing the monitor, make SO<sub>2</sub> emissions reductions available at the particular threshold level. The emissions for all other states are at the base case level.

For each monitor, the predicted 2014 contribution of sulfate from each state is calculated by multiplying the state specific 2012 base case sulfate contribution by the change in ratio of total SO<sub>2</sub> emissions (either the cost threshold level or the base case level depending on whether the state is linked). For each receptor, the total change in sulfate, calculated by adding up the change in contributions from all states is multiplied by the calibration factor. This calibrated change in sulfate is then subtracted from the total sulfate from the 2012 base case modeling, resulting in the "calibrated" average total sulfate. The 2012 base case sulfate includes the contributions from all upwind states as well as the "other" sulfate contributions. When this "calibrated" sulfate is combined with the other components of PM<sub>2.5</sub>, it is possible to estimate total PM<sub>2.5</sub> and to estimate design values. This process is described in the next two sections (4 and 5) for annual PM<sub>2.5</sub> and for 24-hour PM<sub>2.5</sub>, respectively.

#### (4) Calculating new annual PM<sub>2.5</sub> design values using the annual PM2.5 version of AQAT

After estimating total sulfate in 2014 for each cost threshold, EPA estimated resulting average and maximum design values for annual PM<sub>2.5</sub> by adding the total sulfate to the non-sulfate components of ambient PM<sub>2.5</sub> from the CAMx modeling of the 2014 AQAT calibration scenario. The non-sulfate components added in this step were ammonium nitrate, elemental carbon, organic carbon, salt, and blank mass. The resulting sum is the estimated average design value. To estimate the maximum design value, EPA took the difference between the average and maximum design value for the 2012 base case, and added this difference to the 2014 average design value.

## (5) Calculating new 24-hour PM<sub>2.5</sub> design values using quarterly relative response factors in the 24-hour version of AQAT

- Calculate relative response factors as the ratio of calibrated AQAT predicted total sulfate to 2012 CAMx modeled total sulfate
- Calculate predicted 2014 total sulfate for all available CAMx modeled days (8 days per quarter per year) by multiplying the 2012 CAMx modeled concentrations by the relative response factors
- Add 2014 total nitrate and other PM<sub>2.5</sub> species from the 2014 CAMx modeling of the AQAT calibration scenario for each corresponding day
- Calculate the 98th percentile day for each modeled year

- Check the completeness and validity of each modeled year, keeping only the years with monitoring data that met completeness criteria
- Calculate average 2014 predicted DVs for each quantifiable 3-year period of projected historic monitoring data (2003-2005, 2004-2006, and 2005-2007)
- Calculate final average DV as the average of quantifiable 2014 predicted 3-year DVs
- Calculate the maximum DV as the maximum of quantifiable 2014 predicted 3-year DVs

The estimation of design values for the 24-hour PM<sub>2.5</sub> standard is more complicated than it is for the annual PM<sub>2.5</sub> standard, because only the 98<sup>th</sup> percentile day from each of the five years contributes to the design value (and the particular day selected as the 98<sup>th</sup> percentile day can change at different cost threshold levels). After estimating average total sulfate in 2014 for each cost threshold for each quarter, EPA developed relative response factors (RRF) for quarterly sulfate concentrations and used these factors to calculate expected future sulfate concentrations for 32 selected modeled days for each of the 5-years (2003-2007) accounted for in the 2012 CAMx base case modeling. In other words, the "average" quarterly responses were "mapped" to the 8 individual days in each quarter (32 days total per year) for each of the 5 years using the relative response factors. This was done by multiplying the RRF by the 2012 base case sulfate value for each day.

To calculate the relative response factors, EPA took the "average" calibrated quarterly sulfate contribution for the cost threshold level and divided it by the 2012 base case "average" quarterly sulfate contribution. There is a single RRF for each quarter, with the same RRF applied equally to all 5 years.

For each cost threshold level evaluated, EPA multiplied the appropriate quarterly RRF for that threshold to the 2012 base case ammonium sulfate values for each of the 32 days, for each of the 5 years, to estimate adjusted ammonium sulfate values. To these adjusted ammonium sulfate values, EPA added the concentrations from the other PM<sub>2.5</sub> components from the 2014 AQAT calibration scenario (i.e., ammonium nitrate, elemental carbon, organic carbon, salt, and blank mass). The result is 32 PM<sub>2.5</sub> concentrations for each of the 5 years of analysis. The total concentration estimates (and adjusted ammonium sulfate values) for each monitor, year, and day can be found in the "dailyPM\_all\_years\_all\_quarters....xlsx" workbooks. Next, we ranked the values for each year and selected the 98<sup>th</sup> percentile for each year for use in

Next, we ranked the values for each year and selected the 98<sup>th</sup> percentile for each year for use in estimation of the 3-year design values. The particular rank of the value selected depended on the sampling frequency of the monitor (for more details see section V.C.2.b (2) of the preamble, the Air Quality Modeling Final Rule TSD, and the modeling guidance document for state attainment demonstrations of the 24-hour PM<sub>2.5</sub>). The rank of the value that is the 98<sup>th</sup> percentile can be found in the "98thpercentilerank" worksheet in the "dailyPM allyears high quarters.xlsx" workbook in column G.

The 98<sup>th</sup> percentile value for each cost threshold level and for each year can be found in the appropriate worksheet and columns I through M in the "dailyPM\_allyears\_high\_quarters.xlsx" workbook. Three valid consecutive yearly 98<sup>th</sup> percentile values are needed to construct a design value. The completion codes for each potential design value 3-year time-period have values of 1, 2, 3, 4 or missing (0) for each design value period. Values of 1 or 2 indicate compete data and values of 3 or 4 indicate incomplete data. Missing values, or values equal to 0, were treated as incomplete periods.

scenarios was  $0.02~\mu g/m^3$  for organic carbon. By using these components of  $PM_{2.5}$  as modeled in the 2014 AQAT calibration scenario, EPA is appropriately accounting for any changes in these components due to Transport Rule implementation.

 $<sup>^6</sup>$  By using nitrate from the AQAT calibration scenario, the estimate of nitrate is impacted by NOx reductions and SO<sub>2</sub> reductions which lead to nitrate replacement. The concentrations of elemental carbon, organic carbon, salt, and blank are nearly identical in the 2014 base case and AQAT calibration case CAMx modeling. The largest difference in concentration between the two modeled scenarios was 0.02 μg/m³ for organic carbon. By using these components of PM<sub>2.5</sub> as modeled in the 2014 AQAT calibration

The average design value was calculated as the average of all valid design values, while the maximum design value was calculated as the maximum available valid design value.

As the cost threshold value increased, the estimated average and maximum design values at each receptor decreased. In AQAT, the estimated value of the average design value was used to estimate whether the location will be out of attainment, while the estimated maximum design value was used to estimate whether the location will be out of maintenance. The two air quality levels used were 15.05  $\mu$ g/m³ and 35.5  $\mu$ g/m³ to represent the 1997 and 2006 fine particulate matter (PM<sub>2.5</sub>) NAAQS, respectively.

#### 3. Description of the results of the analysis using AQAT for the final approach.

This section describes the results of the analysis using the AQAT for the annual  $PM_{2.5}$ , and 24-hour  $PM_{2.5}NAAQS$  standards. In section C.2 of this TSD, we described the construction of the AQAT to estimate the air quality impacts of various levels of EGU  $SO_2$  emissions. The specific application of the tool is described in this section.

For each identified receptor (identified based on nonattainment and maintenance problems in the CAMx modeled 2012 base case, as described above), EPA applied emissions reductions on a state-by-state basis. As described in section C.2of this TSD, for annual and 24-hour PM<sub>2.5</sub> standards, SO<sub>2</sub> emissions reductions beyond the base case level for the year examined were applied to the state containing the receptor, as well as to upwind states contributing above the 1 percent air quality threshold to that particular receptor. For each receptor and at each cost threshold for SO<sub>2</sub>, we applied AQAT to estimate the resulting sulfate contributions, and resulting design values.

For annual  $PM_{2.5}$  in 2014, the estimated average and maximum  $PM_{2.5}$  design values ( $\mu g/m^3$ ) for each identified receptor can be found in Table C-3 and C-4, respectively. The monitors are in order of decreasing 2012 base case maximum annual  $PM_{2.5}$  design value. No monitors are estimated to have remaining non-attainment problems at the \$2,300/ton  $SO_2$  cost threshold. The only monitor that is estimated to have a remaining maintenance problem at the \$2,300/ton  $SO_2$  cost threshold is monitor number 420030064, located in Allegheny (Liberty-Clairton), Pennsylvania. As indicated in section VIII.B of the preamble, final air quality modeling of the Transport Rule indicates that the maintenance problem estimated by AQAT is resolved.

For 24-hour  $PM_{2.5}$  in 2014, the estimated average and maximum air quality design values ( $\mu g/m^3$ ) for each identified receptor can be found in Table C-5 and C-6, respectively. The monitors are in order of decreasing 2012 base case maximum 24-hour  $PM_{2.5}$  design value. Using AQAT, a majority of the 24-hour  $PM_{2.5}$  receptors are estimated to have their nonattainment and maintenance problems resolved at the \$500/ton cost threshold in 2014. However, a number of receptors are projected to require substantial additional  $SO_2$  emission reductions to achieve the NAAQS.

The total number of estimated remaining nonattainment and maintenance receptors as a function of SO<sub>2</sub> cost threshold is summarized in Table VI.C-2 of the preamble and can be assessed using Tables C-3, C-4, C-5, and C-6. At each cost threshold, receptors are counted if their estimated design value is greater than the NAAQS. Note that because the maximum design value (maintenance) is always equal to or greater than the average design value (nonattainment), all receptors that are estimated to have non-attainment problems are also estimated to have maintenance problems. For example, for the annual PM<sub>2.5</sub> standard, at a cost threshold of \$500/ton, the average and maximum design values for receptor number 420030064 located in Allegheny, PA are estimated to exceed the level of the NAAQS. In Table VI.C-2 in the preamble, this monitoring site accounts for the value of 1 in both the non-attainment and non-attainment or maintenance categories for the annual PM<sub>2.5</sub> columns. Also in Table VI.C-2 of the preamble is a list of the number of projected nonattainment and maintenance areas. These were counted using the number of receptors from Tables C-3,

C-4, C-5, and C-6 and noting the nonattainment area that they are associated with. Note that for the 24-hour PM<sub>2.5</sub> standard, some areas with the receptors identified as having potential nonattainment and/or maintenance issues have not been designated as being nonattainment. For purposes of the final Transport Rule analysis, for these areas, EPA is using the annual PM<sub>2.5</sub> NAAQS nonattainment area designation. For example, for 24-hour PM<sub>2.5</sub>, the receptors in Cook, IL and Lake, IN that are projected to be maintenance in the Transport Rule modeling are associated with their annual PM<sub>2.5</sub>nonattainment area designation (Chicago-Gary-Lake County, IL-IN) since they have not been designated for the 24-hour PM<sub>2.5</sub>NAAQS.

In the assessment of air quality using the calibrated AQAT, it is difficult to estimate the relative contributions of particular upwind states contributing to a particular estimated design value for 24-hour  $PM_{2.5}$  standard. The reason is that the design value is composed of different days, possibly from different seasons, and that these days can change depending on the cost threshold examined. For example, in the base case level, the  $98^{th}$  percentile days which contribute to the design value could primarily be from "warm" seasons, which have high sulfate levels. At a higher cost level, the  $98^{th}$  percentile day could shift to a "cool" season, which has a lower sulfate level. Consequently, this can confound the interpretation of the change in sulfate as well as change in the relative upwind contribution of that sulfate.

Lastly, once the budgets for the final Transport Rule were established (based on the results of the multi-factor test) and IPM was used to model compliance with the final rule, it was possible to estimate air quality concentrations at each downwind receptor using AQAT for the final rule. Average and maximum design value estimates in 2014 for annual PM<sub>2.5</sub> and 24-hour PM<sub>2.5</sub>can be found in Tables C-9 and C-10 in section C.4 of this TSD. Air quality estimates were also made using CAMx and are also summarized in Tables C-9 and C-10 (see section C.4 of this TSD as well as the Air Quality Modeling Final Rule TSD for details). Additional comparisons between AQAT and CAMx estimates are shown in section C.4 of this TSD.

Table C-3. Average Annual PM<sub>2.5</sub> DVs (µg/m<sup>3</sup>) for SO<sub>2</sub> Cost Thresholds (\$/ton) Assessed Using AQAT.

Monitor			CAMx 2012	- ingini zori inyenge immuni i mzne zeolgh y mneo (pg/m/)							
Identification Number	State	County	Base Case (µg/m³)	Base Case	\$500	\$1,600	\$2,300	\$2,800	\$3,300	\$10,000	
Avg. improvement fr	om AQAT base case – 20	12 base case			1.60	1.87	2.02	2.10	2.15	2.42	
receptors											
420030064	Pennsylvania	Allegheny	17.94	17.53	15.78	15.28	15.03	14.97	14.91	14.69	
390350038	Ohio	Cuyahoga	15.99	15.68	14.10	13.77	13.60	13.52	13.46	13.22	
10730023	Alabama	Jefferson	16.15	15.60	14.33	14.38	14.31	14.31	14.38	14.15	
390618001	Ohio	Hamilton	16.01	15.64	13.54	13.18	13.01	12.93	12.85	12.53	
261630033	Michigan	Wayne	15.73	15.44	14.35	14.12	13.87	13.69	13.61	13.22	
390350060	Ohio	Cuyahoga	15.67	15.34	13.75	13.42	13.25	13.17	13.11	12.87	
390610014	Ohio	Hamilton	15.76	15.39	13.29	12.93	12.75	12.67	12.59	12.27	
390610042	Ohio	Hamilton	15.40	15.07	12.97	12.61	12.44	12.36	12.28	11.98	
171191007	Illinois	Madison	15.46	14.85	13.83	13.64	13.56	13.43	13.31	12.99	
10732003	Alabama	Jefferson	15.16	14.68	13.55	13.58	13.52	13.51	13.57	13.36	
390350045	Ohio	Cuyahoga	15.14	14.83	13.23	12.90	12.73	12.65	12.59	12.35	
180970081	Indiana	Marion	14.86	14.52	12.68	12.40	12.26	12.19	12.09	11.79	
131210039	Georgia	Fulton	15.07	14.29	13.35	13.24	13.20	13.18	13.17	13.07	
390617001	Ohio	Hamilton	14.74	14.40	12.30	11.93	11.76	11.68	11.60	11.28	
390350065	Ohio	Cuyahoga	14.67	14.38	12.79	12.45	12.28	12.20	12.14	11.90	
180970083	Indiana	Marion	14.71	14.38	12.53	12.25	12.11	12.04	11.94	11.64	

Table C-4. Maximum Annual PM<sub>2.5</sub> DVs (µg/m<sup>3</sup>) for SO<sub>2</sub> Cost Thresholds (\$/ton) Assessed Using AQAT.

Monitor		CAMx 2012	012 AQAT 2014 Maximum Annual PM2.5 Design Values (μg/m³).								
identification number	State	County	Base Case (µg/m³)	Base Case	\$500	\$1,600	\$2,300	\$2,800	\$3,300	\$10,000	
Avg. improvement from AQAT base case – 2012 base case					1.60	1.87	2.02	2.10	2.15	2.42	
receptors											
420030064	Pennsylvania	Allegheny	18.33	17.92	16.17	15.67	15.42	15.36	15.30	15.08	

390350038	Ohio	Cuyahoga	16.66	16.35	14.77	14.44	14.27	14.19	14.13	13.89
10730023	Alabama	Jefferson	16.46	15.91	14.64	14.69	14.62	14.62	14.69	14.46
390618001	Ohio	Hamilton	16.33	15.96	13.86	13.50	13.33	13.25	13.17	12.85
261630033	Michigan	Wayne	16.32	16.03	14.94	14.71	14.46	14.28	14.20	13.81
390350060	Ohio	Cuyahoga	16.18	15.85	14.26	13.93	13.76	13.68	13.62	13.38
390610014	Ohio	Hamilton	15.98	15.61	13.51	13.15	12.97	12.89	12.81	12.49
390610042	Ohio	Hamilton	15.77	15.44	13.34	12.98	12.81	12.73	12.65	12.35
171191007	Illinois	Madison	15.73	15.12	14.10	13.91	13.83	13.70	13.58	13.26
10732003	Alabama	Jefferson	15.64	15.16	14.03	14.06	14.00	13.99	14.05	13.84
390350045	Ohio	Cuyahoga	15.61	15.30	13.70	13.37	13.20	13.12	13.06	12.82
180970081	Indiana	Marion	15.16	14.82	12.98	12.70	12.56	12.49	12.39	12.09
131210039	Georgia	Fulton	15.10	14.32	13.38	13.27	13.23	13.21	13.20	13.10
390617001	Ohio	Hamilton	15.10	14.76	12.66	12.29	12.12	12.04	11.96	11.64
390350065	Ohio	Cuyahoga	15.10	14.81	13.22	12.88	12.71	12.63	12.57	12.33
180970083	Indiana	Marion	15.06	14.73	12.88	12.60	12.46	12.39	12.29	11.99

Table C-5. Average 24-hour PM<sub>2.5</sub> DVs (μg/m³) for SO<sub>2</sub> Cost Thresholds (\$/ton) Assessed Using AQAT.

Monitor		CAMx 2012		QAT 201	4 Average	24-hour P	M2.5 Desig	n Values (μ	g/m <sup>3</sup> ).	
Identification Number	State	County	Base Case (µg/m³)	Base Case	\$500	\$1,600	\$2,300	\$2,800	\$3,300	\$10,000
<i>U</i> 1	om AQAT base case – 2	012 base case			4.09	4.77	5.09	5.22	5.35	5.80
receptors			4.72	5.70	( 41	( (7	( 95	7.57		
	om AQAT base case – \$		56.71	5424	4.73	5.70	6.41	6.67	6.85	7.57
420030064**	Pennsylvania	Allegheny	56.71	54.34	47.57	46.36	45.54	45.37	45.23	44.72
420030093**	Pennsylvania	Allegheny	39.11	37.51	32.19	30.91	30.25	30.12	29.96	29.36
390350038**	Ohio	Cuyahoga	39.46	37.95	34.18	33.73	33.51	33.43	33.36	32.97
261630016**	Michigan	Wayne	38.99	38.50	34.42	34.15	33.93	33.77	33.70	33.33
390350060	Ohio	Cuyahoga	37.78	37.11	31.50	30.79	30.60	30.51	30.43	30.19
170311016**	Illinois	Cook	37.58	36.11	34.13	33.48	33.13	32.94	32.67	31.95
261630033**	Michigan	Wayne	39.48	39.01	36.31	35.59	35.00	34.65	34.43	33.49
180890022**	Indiana	Lake	34.94	34.04	32.79	32.47	32.38	32.29	32.16	31.85
540090011	West Virginia	Brooke	37.57	36.73	30.60	29.60	29.07	28.94	28.80	28.25
420710007**	Pennsylvania	Lancaster	35.98	35.54	35.19	35.02	34.95	34.94	34.93	34.88
390350045	Ohio	Cuyahoga	34.80	33.63	27.69	26.61	26.30	26.20	26.15	25.95
390811001	Ohio	Jefferson	34.56	33.58	27.64	26.41	25.79	25.65	25.49	24.91
261630019**	Michigan	Wayne	37.34	36.86	35.27	35.09	34.93	34.82	34.77	34.52
390350065	Ohio	Cuyahoga	34.91	33.50	27.65	26.61	26.11	25.95	25.81	25.26
170313301	Illinois	Cook	34.97	33.60	31.11	30.72	30.54	30.40	30.24	29.70
420070014	Pennsylvania	Beaver	36.21	34.84	29.28	28.10	27.59	27.48	27.36	26.94
420033007	Pennsylvania	Allegheny	32.40	30.98	26.27	25.31	24.88	24.80	24.71	24.48
010730023	Alabama	Jefferson	36.96	35.43	31.93	31.86	31.61	31.60	31.74	31.24
550790026	Wisconsin	Milwaukee	33.62	33.28	30.48	30.27	30.15	30.03	29.90	29.50
180970043	Indiana	Marion	35.76	34.67	28.64	27.55	27.16	26.98	26.64	25.84
261470005	Michigan	St Clair	36.23	35.61	33.35	33.01	32.78	32.67	32.59	32.27
550790043	Wisconsin	Milwaukee	36.21	34.98	32.49	32.07	31.85	31.70	31.53	31.19
180890026	Indiana	Lake	34.08	33.00	30.91	30.65	30.52	30.42	30.30	30.05
180970081	Indiana	Marion	35.85	33.70	28.44	27.66	27.35	27.21	26.93	26.20
180970066	Indiana	Marion	35.73	34.49	29.22	28.45	28.13	27.96	27.65	26.95
171191007	Illinois	Madison	36.59	34.59	29.92	29.48	29.32	29.13	28.88	28.13
550790010	Wisconsin	Milwaukee	35.47	35.03	31.50	31.05	30.82	30.73	30.62	30.28
390170003	Ohio	Butler	34.40	33.66	28.07	26.99	26.49	26.33	26.19	25.67
170316005	Illinois	Cook	34.12	33.47	32.72	32.53	32.41	32.31	32.18	31.80
420031008	Pennsylvania	Allegheny	35.04	33.41	26.95	25.44	24.69	24.51	24.33	23.67
261610008	Michigan	Washtenaw	35.05	34.93	29.40	28.71	28.54	28.47	28.42	28.18
170312001	Illinois	Cook	33.62	32.33	29.84	29.68	29.58	29.48	29.37	29.06
170310052	Illinois	Cook	34.94	33.27	30.11	29.87	29.78	29.67	29.53	29.04
421330008	Pennsylvania	York	33.38	33.11	31.60	31.21	31.03	31.00	30.96	30.83
261630015	Michigan	Wayne	35.55	34.42	32.23	31.53	31.10	30.93	30.85	30.50
010732003	Alabama	Jefferson	35.31	34.20	31.42	31.27	31.10	31.08	31.14	30.74
390618001	Ohio	Hamilton	35.29	33.57	27.63	26.51	26.11	25.96	25.77	25.40
171190023	Illinois	Madison	35.11	33.58	29.23	28.69	28.49	28.26	28.07	27.52
420031301	Pennsylvania	Allegheny	33.95	32.45	27.16	25.87	25.21	25.06	24.91	24.28
391130032	Ohio	Montgomery	33.68	32.19	24.40	23.37	23.15	23.05	22.95	22.60

420030116	Pennsylvania	Allegheny	35.59	33.88	27.97	26.86	26.34	26.23	26.08	25.57
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<sup>\*\*</sup> Identify receptors that have maximum design values greater than or equal to 35.5 µg/m³ at the \$500 cost threshold in 2014.

Table C-6. Maximum 24-hour PM<sub>2.5</sub> DVs (μg/m³) for SO<sub>2</sub> Cost Thresholds (\$/ton) Assessed Using AQAT.

Monitor			CAMx	AQ	AT 2014	Maximum	24-hour I	PM2.5 Desi	gn Values (μg/m³).		
Identification Number	State	County	2012 Base Case (μg/m³)	Base Case	\$500	\$1,600	\$2,300	\$2,800	\$3,300	\$10,000	
Avg. improvement fr receptors*	rom AQAT base case – 2	012 base case			4.28	4.98	5.33	5.46	5.60	6.08	
Avg. improvement from AQAT base case – \$500 receptors**					3.27	3.86	4.22	4.37	4.50	4.99	
420030064**	Pennsylvania	Allegheny	59.93	57.64	50.72	49.46	48.63	48.49	48.35	47.81	
420030004	Pennsylvania	Allegheny	44.40	42.63	36.85	35.50	34.80	34.66	34.49	33.84	
390350038**	Ohio	Cuyahoga	41.84	40.37	35.93	35.58	35.41	35.33	35.29	34.90	
261630016**	Michigan	Wayne	41.28	40.77	36.20	35.88	35.65	35.49	35.42	35.08	
390350060	Ohio	Cuyahoga	40.85	39.90	33.69	33.23	33.04	32.94	32.86	32.60	
170311016**	Illinois	Cook	40.44	39.05	37.40	36.85	36.54	36.35	36.10	35.47	
261630033**	Michigan	Wayne	39.81	39.47	36.59	35.84	35.23	34.87	34.65	33.69	
180890022**	Indiana	Lake	39.58	38.68	37.00	36.63	36.51	36.35	36.11	35.55	
540090011	West Virginia	Brooke	38.39	37.68	32.23	30.79	30.02	29.84	29.64	28.87	
420710007**	Pennsylvania	Lancaster	38.37	37.82	37.43	37.25	37.18	37.17	37.15	37.10	
390350045	Ohio	Cuyahoga	38.13	36.65	29.48	28.11	27.60	27.43	27.35	27.13	
390811001	Ohio	Jefferson	37.88	36.91	30.27	28.78	28.03	27.86	27.67	26.95	
261630019**	Michigan	Wayne	37.83	37.29	36.20	36.01	35.83	35.72	35.66	35.41	
390350065	Ohio	Cuyahoga	37.67	36.41	28.79	27.60	27.00	26.80	26.64	26.06	
170313301	Illinois	Cook	37.67	36.26	33.36	33.01	32.84	32.71	32.55	32.11	
420070014	Pennsylvania	Beaver	37.42	35.99	30.46	29.27	28.70	28.58	28.46	28.03	
420033007	Pennsylvania	Allegheny	37.40	35.85	30.73	29.47	28.81	28.68	28.54	28.16	
010730023	Alabama	Jefferson	37.33	35.80	32.50	32.42	32.12	32.10	32.28	31.72	
550790026	Wisconsin	Milwaukee	37.24	36.72	33.54	33.32	33.21	33.09	32.96	32.57	
180970043	Indiana	Marion	37.20	36.09	29.00	28.09	27.82	27.70	27.46	26.83	
261470005	Michigan	St Clair	37.14	36.57	34.16	33.59	33.38	33.29	33.24	33.01	
550790043	Wisconsin	Milwaukee	37.10	35.89	34.22	34.03	33.92	33.83	33.73	33.41	
180890026	Indiana	Lake	37.06	36.05	33.67	33.48	33.37	33.28	33.18	32.91	
180970081	Indiana	Marion	36.96	34.81	28.83	27.95	27.59	27.41	27.08	26.34	
180970066	Indiana	Marion	36.92	35.62	30.40	29.52	29.13	28.93	28.54	27.69	
171191007	Illinois	Madison	36.83	35.20	31.19	30.85	30.66	30.42	30.10	29.16	
550790010	Wisconsin	Milwaukee	36.71	36.56	33.47	33.25	33.13	33.04	32.94	32.62	
390170003	Ohio	Butler	36.59	36.03	28.71	27.76	27.33	27.17	27.01	26.52	
170316005	Illinois	Cook	36.42	35.87	35.09	34.90	34.82	34.71	34.59	34.20	
420031008	Pennsylvania	Allegheny	36.35	34.65	28.15	26.48	25.62	25.39	25.15	24.28	
261610008	Michigan	Washtenaw	36.32	35.38	30.20	29.50	29.33	29.25	29.20	28.95	
170312001	Illinois	Cook	36.12	34.95	32.71	32.49	32.33	32.22	32.07	31.69	
170310052	Illinois	Cook	36.07	34.06	30.62	30.41	30.31	30.21	30.08	29.71	
421330008	Pennsylvania	York	36.06 36.00	35.89	34.55	34.12	33.91	33.88	33.84	33.69	
261630015	Michigan			34.81	33.04	32.35	31.99	31.82	31.74	31.37	
010732003		Alabama Jefferson		34.95	32.23	32.08	31.91	31.89	31.94	31.57	
390618001	Ohio Hamilton		35.85	34.01	28.23	27.13	26.73	26.59	26.45	26.02	
171190023	Illinois Madison		35.81	34.53	30.23	29.70	29.50	29.26	29.07	28.50	
420031301	Pennsylvania Allegheny		35.65	33.91	28.05	26.67	26.15	26.04	25.92	25.44	
391130032 420030116	Ohio	Montgomery	35.61	33.81 33.88	25.99 27.97	24.94	24.62 26.34	24.48 26.23	24.31 26.08	23.80	
420030116	Pennsylvania	Allegheny	35.59	33.88	21.91	26.86	20.34	20.23	20.08	25.57	

<sup>\*</sup> Used in Table VI.C-1 of the preamble

Table C-7. Relationship between the Monitor Receptors and Nonattainment Areas for the Annual  $PM_{2.5}$  NAAQS.

Monitor Identification	State	County	CAMx 2012 Base Case	CAMx 2012 Base Case	Area
Number			Avg. DV	Max. DV	

<sup>\*\*</sup> Used in Table VI.D-1 of the preamble, Identify receptors that have maximum design values greater than or equal to 35.5 µg/m<sup>3</sup> at the \$500 cost threshold in 2014.

			$(\mu g/m^3)$	$(\mu g/m^3)$	
420030064	Pennsylvania	Allegheny	17.94	18.33	Liberty-Clairton, PA
390350038	Ohio	Cuyahoga	15.99	16.66	Cleveland-Akron-Lorain, OH
10730023	Alabama	Jefferson	16.15	16.46	Birmingham, AL
390618001	Ohio	Hamilton	16.01	16.33	Cincinnati-Hamilton, OH-KY-IN
261630033	Michigan	Wayne	15.73	16.32	Detroit-Ann Arbor, MI
390350060	Ohio	Cuyahoga	15.67	16.18	Cleveland-Akron-Lorain, OH
390610014	Ohio	Hamilton	15.76	15.98	Cincinnati-Hamilton, OH-KY-IN
390610042	Ohio	Hamilton	15.40	15.77	Cincinnati-Hamilton, OH-KY-IN
171191007	Illinois	Madison	15.46	15.73	St. Louis, MO-IL
10732003	Alabama	Jefferson	15.16	15.64	Birmingham, AL
390350045	Ohio	Cuyahoga	15.14	15.61	Cleveland-Akron-Lorain, OH
180970081	Indiana	Marion	14.86	15.16	Indianapolis, IN
131210039	Georgia	Fulton	15.07	15.10	Atlanta, GA
390617001	Ohio	Hamilton	14.74	15.10	Cincinnati-Hamilton, OH-KY-IN
390350065	Ohio	Cuyahoga	14.67	15.10	Cleveland-Akron-Lorain, OH
180970083	Indiana	Marion	14.71	15.06	Indianapolis, IN

Table C-8. Relationship between the Monitor Receptors and Nonattainment Areas\* for the 24-hour  $PM_{2.5}$  NAAQS.

Monitor Identification Number	State	County	CAMx 2012 Base Case Avg. DV (µg/m³)	CAMx 2012 Base Case Max. DV (μg/m³)	Area
420030064	Pennsylvania	Allegheny	56.71	59.93	Liberty-Clairton, PA
420030093	Pennsylvania	Allegheny	39.11	44.40	Pittsburgh-Beaver Valley, PA
390350038	Ohio	Cuyahoga	39.46	41.84	Cleveland-Akron-Lorain, OH
261630016	Michigan	Wayne	38.99	41.28	Detroit-Ann Arbor, MI
390350060	Ohio	Cuyahoga	37.78	40.85	Cleveland-Akron-Lorain, OH
170311016	Illinois	Cook	37.58	40.44	Chicago-Gary-Lake County, IL-IN*
261630033	Michigan	Wayne	39.48	39.81	Detroit-Ann Arbor, MI
180890022	Indiana	Lake	34.94	39.58	Chicago-Gary-Lake County, IL-IN*
540090011	West Virginia	Brooke	37.57	38.39	Steubenville-Weirton, OH-WV
420710007	Pennsylvania	Lancaster	35.98	38.37	Lancaster, PA
390350045	Ohio	Cuyahoga	34.80	38.13	Cleveland-Akron-Lorain, OH
390811001	Ohio	Jefferson	34.56	37.88	Steubenville-Weirton, OH-WV
261630019	Michigan	Wayne	37.34	37.83	Detroit-Ann Arbor, MI
390350065	Ohio	Cuyahoga	34.91	37.67	Cleveland-Akron-Lorain, OH
170313301	Illinois	Cook	34.97	37.67	Chicago-Gary-Lake County, IL-IN*
420070014	Pennsylvania	Beaver	36.21	37.42	Pittsburgh-Beaver Valley, PA
420033007	Pennsylvania	Allegheny	32.40	37.40	Liberty-Clairton, PA
10730023	Alabama	Jefferson	36.96	37.33	Birmingham, AL
550790026	Wisconsin	Milwaukee	33.62	37.24	Milwaukee-Racine, WI
180970043	Indiana	Marion	35.76	37.20	Indianapolis, IN*
261470005	Michigan	St Clair	36.23	37.14	Detroit-Ann Arbor, MI
550790043	Wisconsin	Milwaukee	36.21	37.10	Milwaukee-Racine, WI
180890026	Indiana	Lake	34.08	37.06	Chicago-Gary-Lake County, IL-IN*
180970081	Indiana	Marion	35.85	36.96	Indianapolis, IN*
180970066	Indiana	Marion	35.73	36.92	Indianapolis, IN*
171191007	Illinois	Madison	36.59	36.83	St. Louis, MO-IL*
550790010	Wisconsin	Milwaukee	35.47	36.71	Milwaukee-Racine, WI
390170003	Ohio	Butler	34.40	36.59	Cincinnati-Hamilton, OH-KY-IN*
170316005	Illinois	Cook	34.12	36.42	Chicago-Gary-Lake County, IL-IN*
420031008	Pennsylvania	Allegheny	35.04	36.35	Pittsburgh-Beaver Valley, PA
261610008	Michigan	Washtenaw	35.05	36.32	Detroit-Ann Arbor, MI
170312001	Illinois	Cook	33.62	36.12	Chicago-Gary-Lake County, IL-IN*
170310052	Illinois	Cook	34.94	36.07	Chicago-Gary-Lake County, IL-IN*
421330008	Pennsylvania	York	33.38	36.06	Harrisburg-Lebanon-Carlisle, PA
261630015	Michigan	Wayne	35.55	36.00	Detroit-Ann Arbor, MI
10732003	Alabama	Jefferson	35.31	35.94	Birmingham, AL
390618001	Ohio	Hamilton	35.29	35.85	Cincinnati-Hamilton, OH-KY-IN*
171190023	Illinois	Madison	35.11	35.81	St. Louis, MO-IL*

420031301	Pennsylvania	Allegheny	33.95	35.65	Pittsburgh-Beaver Valley, PA
391130032	Ohio	Montgomery	33.68	35.61	Dayton-Springfield, OH*
420030116	Pennsylvania	Allegheny	35.59	35.59	Pittsburgh-Beaver Valley, PA

<sup>\*</sup> Indicates that the receptor is not associated with a designated nonattainment area for the 24-hour  $PM_{2.5}$  NAAQS. Consequently, only for purposes of this analysis, EPA associated the receptor with the area designated with respect to the annual  $PM_{2.5}$  NAAQS.

#### 4. Comparison between the air quality assessment tool estimates and CAMx air quality modeling estimates.

As the AQAT was being developed for the final Transport Rule, it was possible to evaluate the estimates from the tool with the model predictions from CAMx for the 2014 base case scenario. This case was independently modeled in CAMx. The estimates were not used in the development or calibration of the AQAT. Consequently, a comparative analysis was done between the assessment tool and the CAMx modeling for 2014 base case ammonium sulfate estimates as well as the resulting design value estimates. Additionally, when the CAMx air quality modeling of the final remedy (2014 control case) was available, a corresponding comparative analysis was also done with the estimates from the assessment tool.

Examination of the comparison for the 2014 base shows strong correlations (nearly one to one) between the estimated design values from AQAT and CAMx (Table C-10 and Figure C-1)

Examination of the results of the CAMx modeling for 2014, implementing the remedy, shows that nearly all of the air quality monitoring locations of interest are estimated to be brought into attainment and maintenance for both the 24-hour and annual  $PM_{2.5}$  standards (see sections VI.C and VI.D of the preamble). Qualitatively, these results are quite similar to those from the assessment tool. Quantitatively, the results are also very similar, demonstrating that the calibrated AQAT was adequate (Tables C-9 and C-10, Figures C-1 and C-2).

In addition, for the 24-hour  $PM_{2.5}$  standards, EPA conducted a detailed comparison of the sulfate estimates from AQAT and CAMx (relative to the  $98^{th}$  percentile days selected according to CAMx) for both the 2014 base case and 2014 remedy case. The comparison is shown graphically for sulfate in Figure C-3. The sulfate estimates, as well as the  $PM_{2.5}$  concentrations for the CAMx  $98^{th}$  percentile days, are contained in Appendix B, Tables B-1 and B-2.

Table C-9. Average and Maximum Annual  $PM_{2.5}$  DVs ( $\mu g/m^3$ ) in the 2014 Remedy Case Scenarios as Modeled in CAMx and as Estimated in Calibrated AQAT, for Receptors with Maximum DVs Greater than or

Equal to 15.05 μg/m<sup>3</sup> in the 2012 Base Case.

Monitor Identification Number	State	County	2014 Remedy Scenario					
			CAMx	CAMx	AQAT	AQAT	Difference (CAMx- AQAT)	Difference (CAMx- AQAT)
	Avg. of a	all 2012 base case	12.74	13.05	12.98	13.36	-0.24	-0.30
420030064	Pennsylvania	Allegheny	14.62	14.95	14.86	15.25	-0.24	-0.30
390350038	Ohio	Cuyahoga	12.99	13.54	13.51	14.18	-0.52	-0.64
010730023	Alabama	Jefferson	13.94	14.21	13.89	14.20	0.05	0.01
390618001	Ohio	Hamilton	12.73	12.99	12.96	13.28	-0.23	-0.29
261630033	Michigan	Wayne	13.59	14.08	13.77	14.36	-0.18	-0.28
390350060	Ohio	Cuyahoga	12.70	13.14	13.16	13.67	-0.46	-0.53
390610014	Ohio	Hamilton	12.47	12.63	12.70	12.92	-0.23	-0.29
390610042	Ohio	Hamilton	12.16	12.47	12.36	12.73	-0.20	-0.26
171191007	Illinois	Madison	13.28	13.51	13.39	13.66	-0.11	-0.15
010732003	Alabama	Jefferson	13.11	13.53	13.13	13.61	-0.02	-0.08
390350045	Ohio	Cuyahoga	12.15	12.53	12.64	13.11	-0.49	-0.58
180970081	Indiana	Marion	12.01	12.27	12.24	12.54	-0.23	-0.27

131210039	Georgia	Fulton	12.99	13.02	13.07	13.10	-0.08	-0.08
390617001	Ohio	Hamilton	11.48	11.80	11.71	12.07	-0.23	-0.27
390350065	Ohio	Cuyahoga	11.69	12.03	12.19	12.62	-0.50	-0.59
180970083	Indiana	Marion	11.86	12.16	12.09	12.44	-0.23	-0.28

Table C-10. Average and Maximum 24-hour  $PM_{2.5}$  DVs ( $\mu g/m^3$ ) in the 2014 Base Case and 2014 Remedy Case Scenarios as Modeled in CAMx and as Estimated in AQAT.

Monitor Identification Number	State	County			2014 Base C	Case Scenari	io				2014 Reme	dy Scenario		
1,4113.02			CAMx	CAMx	AQAT	AQAT	Differen ce (CAMx-	Differe nce (CAMx	CAMx	CAMx	AQAT	AQAT	Differe nce (CAMx	Differe nce (CAMx
							AQAT)	AQAT)					AQAT)	AQAT)
avg. of 6 sites*			38.89	41.49	39.23	41.88	-0.34	-0.38	35.52	38.05	35.72	38.27	-0.20	-0.22
avg. of 8 sites**			38.73	41.01	39.04	41.39	-0.32	-0.38	35.01	37.17	35.32	37.50	-0.31	-0.33
Avg. of all 2012			34.79	36.70	35.05	36.96	-0.26	-0.27	29.53	31.17	29.82	31.48	-0.29	-0.31
420030064	Pennsylvania	Allegheny	54.14	57.51	54.34	57.64	-0.20	-0.14	45.03	48.09	45.45	48.52	-0.42	-0.43
420030093	Pennsylvania	Allegheny	37.53	42.57	37.51	42.63	0.03	-0.06	29.44	33.76	29.88	34.28	-0.44	-0.52
390350038	Ohio	Cuyahoga	38.24	40.57	37.95	40.37	0.29	0.21	32.64	34.55	33.46	35.39	-0.82	-0.84
261630016	Michigan	Wayne	37.94	40.17	38.50	40.77	-0.56	-0.60	33.72	35.43	33.88	35.61	-0.16	-0.18
390350060	Ohio	Cuyahoga	36.78	39.76	37.11	39.90	-0.33	-0.14	29.82	32.20	30.51	32.94	-0.69	-0.74
170311016	Illinois	Cook	35.89	38.72	36.11	39.05	-0.22	-0.33	32.69	36.16	32.95	36.40	-0.26	-0.24
261630033	Michigan	Wayne	38.22	38.52	39.01	39.47	-0.79	-0.95	34.31	34.50	34.74	34.95	-0.43	-0.45
180890022	Indiana	Lake	33.77	38.31	34.04	38.68	-0.27	-0.37	32.18	36.10	32.31	36.30	-0.13	-0.20
540090011	West Virginia	Brooke	36.20	37.04	36.73	37.68	-0.53	-0.63	28.39	29.11	28.83	29.63	-0.44	-0.52
420710007	Pennsylvania	Lancaster	35.31	37.60	35.54	37.82	-0.24	-0.22	34.77	36.97	34.87	37.08	-0.10	-0.11
390350045	Ohio	Cuyahoga	33.78	37.08	33.63	36.65	0.14	0.43	25.51	26.61	26.23	27.43	-0.72	-0.82
390811001	Ohio	Jefferson	33.16	36.45	33.58	36.91	-0.43	-0.46	25.14	27.30	25.57	27.76	-0.43	-0.46
261630019	Michigan	Wayne	36.31	36.65	36.86	37.29	-0.55	-0.64	34.71	35.57	34.87	35.74	-0.16	-0.17
390350065	Ohio	Cuyahoga	33.77	36.57	33.50	36.41	0.26	0.16	25.15	25.94	25.95	26.81	-0.80	-0.87
170313301	Illinois	Cook	33.49	36.17	33.60	36.26	-0.11	-0.09	30.23	32.58	30.35	32.70	-0.12	-0.12
420070014	Pennsylvania	Beaver	34.57	35.73	34.84	35.99	-0.27	-0.26	27.00	28.09	27.39	28.49	-0.39	-0.40
420033007	Pennsylvania	Allegheny	30.95	35.71	30.98	35.85	-0.03	-0.14	24.54	28.30	24.78	28.63	-0.24	-0.33
010730023	Alabama	Jefferson	35.69	36.01	35.43	35.80	0.26	0.21	31.14	31.63	31.10	31.57	0.04	0.06
550790026	Wisconsin	Milwaukee	32.39	35.99	33.28	36.72	-0.88	-0.73	29.96	32.95	30.08	33.10	-0.12	-0.15
180970043	Indiana	Marion	34.35	35.73	34.67	36.09	-0.32	-0.36	26.67	27.42	27.13	27.76	-0.46	-0.34
261470005	Michigan	St Clair	35.06	36.01	35.61	36.57	-0.54	-0.56	32.28	32.94	32.67	33.29	-0.39	-0.35
550790043	Wisconsin	Milwaukee	34.57	35.41	34.98	35.89	-0.41	-0.48	31.69	33.83	31.80	33.92	-0.11	-0.09
180890026	Indiana	Lake	32.82	35.82	33.00	36.05	-0.19	-0.23	30.36	33.25	30.49	33.39	-0.13	-0.14
180970081	Indiana	Marion	34.12	35.18	33.70	34.81	0.42	0.23	26.90	27.04	27.30	27.54	-0.40	-0.50
180970066	Indiana	Marion	34.21	35.34	34.49	35.62	-0.28	-0.28	27.67	28.63	28.10	29.11	-0.43	-0.48
171191007	Illinois	Madison	34.68	35.36	34.59	35.20	0.08	0.16	29.24	30.51	29.32	30.64	-0.08	-0.13
550790010	Wisconsin	Milwaukee	34.08	35.44	35.03	36.56	-0.95	-1.12	30.76	33.05	30.83	33.13	-0.07	-0.08
390170003	Ohio	Butler	33.01	35.42	33.66	36.03	-0.65	-0.61	26.17	26.97	26.47	27.29	-0.30	-0.32
170316005	Illinois	Cook	32.72	34.94	33.47	35.87	-0.75	-0.93	31.90	34.32	32.02	34.45	-0.12	-0.13
420031008	Pennsylvania	Allegheny	33.28	34.49	33.41	34.65	-0.13	-0.16	24.00	24.85	24.47	25.38	-0.12	-0.13
261610008	Michigan	Washtenaw	33.28	35.01	34.93	35.38	-0.13	-0.16	28.42	29.21	28.47	29.26	-0.47	-0.33
170312001	Illinois	Cook	32.46	34.96	32.33	34.95	0.13	0.01	29.41	32.09	29.50	32.21	-0.03	-0.03
170312001	Illinois	Cook	33.20	34.96	32.33	34.95	-0.07	0.01	29.41	30.06	29.50	30.20	-0.09	-0.12
421330008	Pennsylvania	York	32.65	35.36	33.11	35.89	-0.07	-0.53	30.81	33.68	30.92	33.79	-0.13	-0.14
261630015	Michigan	Wayne	34.20	34.69	34.42	34.81	-0.46	-0.53	30.81	31.67	31.02	31.91	-0.11	-0.11
010732003	Alabama	Jefferson	34.20	34.69	34.42	34.81	0.07	-0.12	30.80	31.07	30.62	31.46	-0.22	-0.24
390618001	Ohio	Hamilton	33.51	33.92	33.57	34.93	-0.07	-0.03	25.60	26.29	25.96	26.64	-0.03	-0.07
171190023							-0.07	-0.09	28.33			29.41	-0.36	-0.35
	Illinois	Madison	32.86	33.63	33.58 32.45	34.53 33.91	-0.72			29.33	28.41			
420031301 391130032	Pennsylvania Ohio	Allegheny Montgomer	32.38 32.15	33.87 33.93	32.45	33.91	-0.07	-0.04 0.12	24.58 22.85	25.49 24.24	24.96	25.85 24.54	-0.38 -0.24	-0.36 -0.30
		y Allegheny	33.87	33.87	33.88	33.88	-0.02	-0.02	25.67	25.67	26.13	26.13	-0.46	-0.46
420030116	Pennsylvania	Allegheny	33.8/	33.87 DA (07)				-0.02	25.67		20.13	20.13	-0.46	-0.46

<sup>\*</sup>The six sites are Allegheny, PA (64); Lancaster, PA (07); Wayne, MI (16 and 19); Cook, IL (16); and Lake, IN (22).

\*\*The eight sites include the six sites listed above as well as Cuyahoga, OH (38) and Wayne, MI (33).

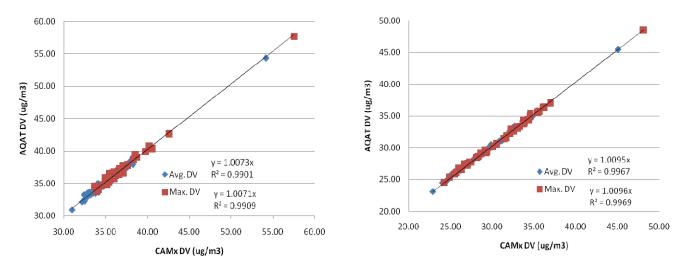


Figure C-1. Least squares linear regression plots showing correlations between estimated average and maximum design values ( $\mu g/m^3$ ) for 24-hour PM<sub>2.5</sub> for CAMx and calibrated AQAT for the 2014 base case (left panel) and 2014 remedy (right panel).

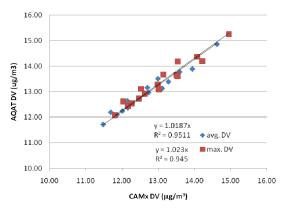
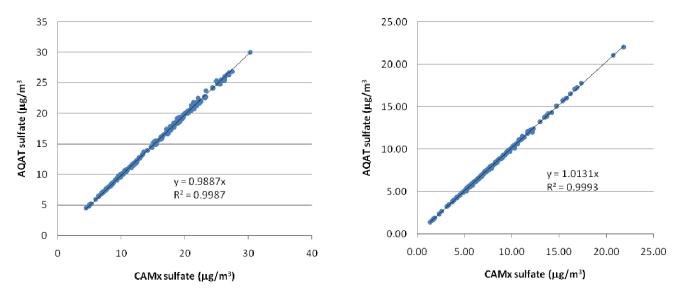


Figure C-2. Least squares linear regression plots showing correlations between estimated average and maximum design values ( $\mu g/m^3$ ) for annual PM<sub>2.5</sub> for CAMx and calibrated AQAT for the 2014 remedy.



\*98<sup>th</sup> percentile day chosen by CAMx, with the matching day from AQAT selected for comparison.

Figure C-3. Least squares linear regression plots showing correlations between estimated sulfate ( $\mu g/m^3$ ) for the 98<sup>th</sup> percentile 24-hour PM<sub>2.5</sub> day for each year\* for CAMx and calibrated AQAT for the 2014 base case (left panel) and 2014 remedy (right panel).

## 5. Using the AQAT to estimate contributions in 2012 resulting from "leakage" of emissions to states not included in one or more of the programs for the Transport Rule.

As described in sections VI.C and XII.J.2.a. of the preamble for the final Transport Rule, EPA projects that some states not covered by any of the fine particle control programs in the final Transport Rule may experience increases of SO<sub>2</sub> emissions greater than 5,000 tons compared to the base case. These states are Arkansas, Colorado, Louisiana, Montana, and Wyoming. Using AQAT, for the states with source contribution modeling (i.e., Arkansas and Louisiana), EPA estimated whether these SO<sub>2</sub> emission increases would result in these states exceeding the contribution thresholds. This was done by adding the "leakage" emissions to the 2012 base case emissions. As can be seen in the "base leakage\_2012\_threshold" worksheet in the "annual PM25 AQAT.xlsx" workbook, the estimated contributions from these states for annual PM<sub>2.5</sub> nonattainment and maintenance sites remain well below the 1% NAAQS threshold.

A similar assessment was made for the 24-hour PM<sub>2.5</sub>NAAQS. EPA added the relative SO<sub>2</sub> emission increases to each of the quarterly emission values for the 2012 base case. EPA then used the 24-hour PM<sub>2.5</sub> AQAT and estimated the 2012 base case quarterly contributions and the resulting design values for all monitors. EPA, then, examined the sulfate contributions from these states, finding that Arkansas had relatively large contributions in the summer months to sites in Cook, IL (monitor 170311016 quarter 2); and in Lake, IN (monitors 180890022 and 180890026 in quarter 2). For the Cook, IL site, only one of the 98<sup>th</sup> percentile values is in the second quarter (2007). For the Lake county monitors 180890022 and 180890026, none of the 98<sup>th</sup> percentile values are in the second quarter. Consequently, EPA concludes that Arkansas' contribution is unlikely to go above the 1% contribution threshold. Similarly, Louisiana had relatively large contributions to Jefferson, AL in quarter 1. In looking at when the 98<sup>th</sup> percentile days were in the years for

2003-2007, for monitor 10730023 Jefferson, AL, the values did not occur in quarter 1. EPA concludes that LA does not exceed the 1% contribution threshold.

<b>Appendix A:</b>	IPM Runs Used in Transport Rule Significant Contribution
	Analysis

Table A-1 lists IPM runs used in the significant contribution analysis. The IPM runs can be found in the docket for this rulemaking (Docket ID No. EPA-HQ-OAR-2009-0491).

Table Appendix A-1. IPM Runs Used in Transport Rule Significant Contribution Analysis

Run Name	Run Description
TR_Base_Case_Final	Base Case model run, which includes the national Title IV SO <sub>2</sub> cap-and-trade program; NO <sub>x</sub> SIP Call regional ozone season cap-and-trade program; and settlements and state rules through Fall of 2010. This run represents conditions without the proposed Transport Rule and without the rule it would replace (CAIR).
TR_SO2_500_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012, \$500 per ton for Group 1 States in 2012 and 2013, \$500 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.
TR_SO2_1600_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012, \$500 per ton for Group 1 States in 2012 and 2013, \$1,600 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.
TR_SO2_2300_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012, \$500 per ton for Group 1 States in 2012 and 2013, \$2,300 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.
TR_SO2_2800_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012, \$500 per ton for Group 1 States in 2012 and 2013, \$2,800 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.

TR_SO2_3300_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012, \$500 per ton for Group 1 States in 2012 and 2013, \$3,300 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.
TR_SO2_10,000_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ year round in annual states starting in 2012, \$500 per ton of ozone season $NO_x$ in ozone states starting in 2012, \$500 per ton for $SO_2$ year round in "Group 2" states starting in 2012. For $SO_2$ "Group 1" states, a cap of 2.41 million tons is imposed in 2012 and 2013, and a cap of 344,000 ton is imposed in 2014 and each year thereafter for $SO_2$ . These caps were designed to reflect a 70% reduction from levels observed in the \$500 per ton for Group 1 States in 2012 and 2013, \$3,300 per ton for Group 1 states in 2014 and each year thereafter. Also forces all SCR and FGD to operate for relevant time period if in a TR covered state.
TR_NOX_OS_500_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ reduced in the ozone season on each of 26 ozone states (including the six states for which EPA is issuing a supplemental proposal to require ozone season $NO_x$ reductions) starting in 2012. Also forces dispatchable SCRs to run in the ozone season if located in this region
TR_NOX_OS_1000_Final	Imposes a marginal cost of \$1,000 per ton of $NO_x$ reduced in the ozone season on each of 26 ozone states (including the six states for which EPA is issuing a supplemental proposal to require ozone season $NO_x$ reductions) starting in 2012. Also forces dispatchable SCRs to run in the ozone season if located in this region
TR_NOX_OS_5000_Final	Imposes a marginal cost of \$5,000 per ton of NO <sub>x</sub> reduced in the ozone season on each of 26 ozone states (including the six states for which EPA is issuing a supplemental proposal to require ozone season NO <sub>x</sub> reductions) starting in 2012. Also forces dispatchable SCRs to run in the ozone season if located in this region
TR_NOX_500_Final	Imposes a marginal cost of \$500 per ton of $NO_x$ reduced annually on each of 23 states in the annual region. Also forces SCRs to operate year round if located in this region
TR_NOX_1000_Final	Imposes a marginal cost of \$1,000 per ton of NO <sub>x</sub> reduced annually on each of 23 states in the annual region. Also forces SCRs to operate year round if located in this region
TR_NOX_2500_Final	Imposes a marginal cost of $$2,500$ per ton of $NO_x$ reduced annually on each of 23 states in the annual region. Also forces SCRs to operate year round if located in this region

Appendix B:	Detailed Comparison	n of AQAT Estin	nates with CAM	x Results
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This Appendix contains tables with detailed comparisons of the sulfate and total PM<sub>2.5</sub> for the AQAT estimates compared with CAMx for the 2014 base case and 2014 final remedy (Table Appendix B-1 and Table Appendix B-2, respectively). The 98<sup>th</sup> percentile days were selected based on the days used to create the design value according to the CAMx results. That is, the 98<sup>th</sup> percentile day may have been different in AQAT. For this particular analysis, whatever day the "Future Date" was selected based on the CAMx estimates was the day selected from the AQAT results. Consequently, the AQAT to CAMx design value comparison (presented in table C-10 in this TSD) could have been based on different subset of days from AQAT.

Table Appendix B-1. Comparison of Sulfate and Total PM<sub>2.5</sub> for 98<sup>th</sup> Percentile Days\* for the 2014 Base Case.

						Sulfa	ite		Total P	M2.5
Future	Monitor			2012 Base		Sum	Difference		1011111	Difference
Date	Identification	State	County	Case	CAMx	AQAT	(CAMx-	CAMx	AQAT	(CAMx-
Date	Number			Max. DV	CHINA	110111	AQAT),	CHIVIA	110111	AQAT), Total
20031031	420030064	Danier Inchis	A 11 1	59.93	15.15	15.22	Sulfate	56.44	56.51	PM2.5
20031031	420030064	Pennsylvania Pennsylvania	Allegheny Allegheny	59.93 59.93	15.15	15.22	-0.07 0.21	56.44 57.78	56.51 58.91	-0.07 -1.13
20050914	420030004	Pennsylvania	Allegheny	59.93	30.25	29.99	0.21	58.31	58.04	0.26
20060618	420030064	Pennsylvania	Allegheny	59.93	22.04	22.50	-0.46	47.30	47.75	-0.46
20070422	420030064	Pennsylvania	Allegheny	59.93	21.32	21.76	-0.44	45.76	46.20	-0.44
20030626	420030093	Pennsylvania	Allegheny	44.40	18.15	18.37	-0.22	47.08	47.29	-0.22
20040608	420030093	Pennsylvania	Allegheny	44.40	15.11	15.29	-0.18	39.27	39.45	-0.18
20050913	420030093	Pennsylvania	Allegheny	44.40	19.20	19.00	0.20	41.35	41.14	0.21
20060710	420030093	Pennsylvania	Allegheny	44.40	14.03	13.89	0.15	30.37	30.21	0.15
20070524	420030093	Pennsylvania	Allegheny	44.40	10.48	10.61	-0.13	27.40	27.52	-0.12
20030821 20040607	390350038 390350038	Ohio	Cuyahoga	41.84	25.34 25.06	24.82 24.91	0.52 0.14	40.83 36.78	40.31 36.63	0.52 0.14
20040607	390350038	Ohio Ohio	Cuyahoga Cuyahoga	41.84 41.84	25.06	26.83	0.14	36.78 44.10	43.54	0.14
20060818	390350038	Ohio	Cuyahoga	41.84	19.56	19.16	0.36	31.63	31.23	0.37
20070906	390350038	Ohio	Cuyahoga	41.84	21.18	20.75	0.43	34.21	33.78	0.44
20030318	261630016	Michigan	Wayne	41.28	11.05	10.92	0.13	41.57	42.52	-0.95
20040730	261630016	Michigan	Wayne	41.28	20.55	20.33	0.21	32.35	32.13	0.22
20040904	261630016	Michigan	Wayne	41.28	20.55	20.33	0.21	32.35	32.13	0.22
20050202	261630016	Michigan	Wayne	41.28	12.40	12.26	0.14	46.60	47.67	-1.07
20060330	261630016	Michigan	Wayne	41.28	8.80	8.70	0.10	33.21	33.97	-0.76
20070906	261630016	Michigan	Wayne	41.28	18.37	18.18	0.19	28.98	28.78	0.19
20030702	390350060	Ohio	Cuyahoga	40.85	25.89	25.36	0.53	38.69	38.16	0.53
20040218	390350060	Ohio	Cuyahoga	40.85	10.82	10.59	0.24	38.40	39.53	-1.12
20051004	390350060	Ohio	Cuyahoga	40.85	16.51	16.29	0.21 0.09	42.19 28.02	42.79	-0.61
20060529 20070921	390350060 390350060	Ohio Ohio	Cuyahoga Cuyahoga	40.85 40.85	15.15 21.98	15.06 21.53	0.09	32.92	27.93 32.47	0.09 0.45
20030316	170311016	Illinois	Cook	40.44	8.66	8.64	0.43	38.12	38.72	-0.60
20030310	170311016	Illinois	Cook	40.44	8.37	8.29	0.02	35.24	36.08	-0.83
20050802	170311016	Illinois	Cook	40.44	19.50	19.07	0.44	42.79	42.35	0.44
20061219	170311016	Illinois	Cook	40.44	6.44	6.38	0.06	27.24	27.88	-0.64
20070617	170311016	Illinois	Cook	40.44	12.48	12.15	0.34	31.56	31.28	0.27
20030301	261630033	Michigan	Wayne	39.81	9.69	9.58	0.11	36.63	37.44	-0.81
20040608	261630033	Michigan	Wayne	39.81	21.83	21.75	0.08	33.43	33.35	0.08
20050206	261630033	Michigan	Wayne	39.81	11.98	11.84	0.14	45.17	46.17	-1.00
20061213	261630033	Michigan	Wayne	39.81	7.50	7.59	-0.10	36.95	38.88	-1.93
20070524	261630033	Michigan	Wayne	39.81	20.26	20.19	0.07	31.06	30.99	0.07
20030301 20041226	180890022 180890022	Indiana Indiana	Lake Lake	39.58 39.58	11.72 10.70	11.70 10.77	0.02 -0.08	40.77 38.80	41.06 39.69	-0.29 -0.89
20050113	180890022	Indiana	Lake	39.58	10.70	10.77	0.01	35.36	35.61	-0.25
20060123	180890022	Indiana	Lake	39.58	6.97	6.96	0.01	24.45	24.62	-0.23
20070921	180890022	Indiana	Lake	39.58	17.57	17.15	0.42	30.58	30.16	0.42
20031229	540090011	West Virginia	Brooke	38.39	9.56	9.71	-0.15	36.44	36.76	-0.32
20040212	540090011	West Virginia	Brooke	38.39	16.98	16.70	0.28	39.36	40.62	-1.25
20050419	540090011	West Virginia	Brooke	38.39	24.93	25.34	-0.41	35.33	35.74	-0.41
20060222	540090011	West Virginia	Brooke	38.39	14.11	13.87	0.23	32.78	33.82	-1.04
20070828	540090011	West Virginia	Brooke	38.39	20.39	20.39	0.00	39.07	39.05	0.02
20030313	420710007	Pennsylvania	Lancaster	38.37	11.56	11.41	0.15	44.04	44.43	-0.39
20041009	420710007	Pennsylvania	Lancaster	38.37	4.43	4.52	-0.10	30.06	30.00	0.06
20050209 20060330	420710007 420710007	Pennsylvania	Lancaster	38.37 38.37	10.14 8.57	10.01 8.46	0.13 0.11	38.69 32.78	39.03 33.07	-0.34 -0.29
20070301	420710007	Pennsylvania Pennsylvania	Lancaster Lancaster	38.37	8.35	8.24	0.11	31.94	32.22	-0.28
20030702	390350045	Ohio	Cuyahoga	38.13	26.24	25.70	0.54	38.50	37.96	0.54
20040304	390350045	Ohio	Cuyahoga	38.13	10.89	10.65	0.24	33.29	34.43	-1.14
20050913	390350045	Ohio	Cuyahoga	38.13	26.89	26.34	0.55	39.44	38.89	0.55
20060210	390350045	Ohio	Cuyahoga	38.13	8.22	8.04	0.18	25.25	26.11	-0.86
20070921	390350045	Ohio	Cuyahoga	38.13	20.41	20.00	0.42	30.07	29.65	0.42
20031126	390811001	Ohio	Jefferson	37.88	13.51	13.72	-0.21	34.02	34.46	-0.44
20040702	390811001	Ohio	Jefferson	37.88	20.06	20.06	0.00	40.54	40.52	0.02
20050913	390811001	Ohio	Jefferson	37.88	17.19	17.19	0.00	34.81	34.79	0.02
20060827	390811001	Ohio	Jefferson	37.88	12.75	12.74	0.00	25.94	25.92	0.01
20070804 20030801	390811001 261630019	Ohio Michigan	Jefferson	37.88 37.83	13.30 20.28	13.30 20.05	0.00 0.23	27.03 32.86	27.02 32.62	0.01 0.24
20040304	261630019	Michigan Michigan	Wayne Wayne	37.83	7.56	7.44	0.23	29.72	30.26	-0.53
20050206	261630019	Michigan	Wayne	37.83	12.12	11.93	0.12	47.37	48.23	-0.86
20030200	201030017	ciiiguii	" uyiic	57.05	12.12	11.75	0.17	47.57	40.23	0.00

20060309	261630019	Michigan	Wayne	37.83	8.35	8.22	0.13	32.80	33.39	-0.59
20070921	261630019	Michigan	Wayne	37.83	16.46	16.27	0.19	26.75	26.56	0.20
20030316	390350065	Ohio	Cuyahoga	37.67	11.97	11.71	0.26	36.18	37.43	-1.25
20040924	390350065	Ohio	Cuyahoga	37.67	22.44	21.99	0.46	32.32	31.86	0.46
	390350065	Ohio					0.15	41.22		
20050627			Cuyahoga	37.67	25.62	25.47			41.07	0.15
20060710	390350065	Ohio	Cuyahoga	37.67	16.38	16.05	0.34	23.73	23.39	0.34
20070921	390350065	Ohio	Cuyahoga	37.67	22.20	21.75	0.45	31.98	31.52	0.46
20030202	170313301	Illinois	Cook	37.67	7.16	7.08	0.08	32.35	32.70	-0.35
20040903	170313301	Illinois	Cook	37.67	17.86	17.35	0.51	34.82	34.30	0.51
20050203	170313301	Illinois	Cook	37.67	9.18	9.07	0.10	41.34	41.79	-0.45
20060704	170313301	Illinois	Cook	37.67	11.46	11.14	0.33	22.53	22.20	0.33
20060806		Illinois	Cook		11.46	11.14	0.33	22.53		0.33
	170313301			37.67					22.20	
20071120	170313301	Illinois	Cook	37.67	7.36	7.32	0.05	30.35	31.31	-0.96
20030822	420070014	Pennsylvania	Beaver	37.42	15.45	15.51	-0.06	27.44	27.49	-0.05
20040711	420070014	Pennsylvania	Beaver	37.42	18.88	18.95	-0.07	33.42	33.48	-0.06
20050627	420070014	Pennsylvania	Beaver	37.42	23.28	23.74	-0.47	39.87	40.33	-0.46
20061128	420070014	Pennsylvania	Beaver	37.42	8.14	8.13	0.01	33.91	34.09	-0.18
20070524	420070014	Pennsylvania	Beaver	37.42	17.11	17.45	-0.34	29.43	29.77	-0.34
	420033007									
20030626		Pennsylvania	Allegheny	37.40	18.77	19.16	-0.39	48.80	49.19	-0.39
20040924	420033007	Pennsylvania	Allegheny	37.40	18.46	18.31	0.15	32.63	32.48	0.16
20050627	420033007	Pennsylvania	Allegheny	37.40	9.78	9.99	-0.20	25.69	25.89	-0.20
20060710	420033007	Pennsylvania	Allegheny	37.40	16.58	16.44	0.14	29.36	29.22	0.14
20070804	420033007	Pennsylvania	Allegheny	37.40	16.21	16.07	0.14	28.71	28.57	0.14
20031103	10730023	Alabama	Jefferson	37.33	9.29	9.33	-0.03	31.67	31.74	-0.07
20040723	10730023	Alabama	Jefferson	37.33	15.32	14.89	0.42	34.09	33.66	0.42
20050914	10730023	Alabama	Jefferson	37.33	18.25	17.74	0.51	40.51	40.01	0.51
20061216	10730023	Alabama	Jefferson	37.33	9.49	9.52	-0.03	32.32	32.39	-0.07
20070521	10730023	Alabama	Jefferson	37.33	14.70	14.51	0.19	35.19	35.00	0.19
20031009	550790026	Wisconsin	Milwaukee	37.24	5.20	5.21	-0.01	25.52	25.92	-0.40
20040110	550790026	Wisconsin	Milwaukee	37.24	6.79	6.73	0.05	24.30	25.54	-1.24
20050203	550790026	Wisconsin	Milwaukee	37.24	10.23	10.15	0.08	36.38	38.25	-1.87
20061125	550790026	Wisconsin	Milwaukee	37.24	7.52	7.53	-0.01	36.69	37.27	-0.58
20070220		Wisconsin	Milwaukee	37.24	9.80	9.73	0.07	34.89		
	550790026								36.68	-1.79
20030813	180970043	Indiana	Marion	37.20	22.54	21.93	0.61	33.45	32.83	0.62
20040720	180970043	Indiana	Marion	37.20	18.80	18.29	0.51	27.99	27.47	0.52
20050203	180970043	Indiana	Marion	37.20	11.59	11.23	0.36	39.74	41.35	-1.61
20060725	180970043	Indiana	Marion	37.20	22.30	21.69	0.61	33.10	32.49	0.61
20070726	180970043	Indiana	Marion	37.20	23.14	22.51	0.63	34.33	33.70	0.63
20030608	261470005	Michigan	St Clair	37.14	21.35	21.04	0.31	31.27	30.97	0.30
		. 0								
20040903	261470005	Michigan	St Clair	37.14	18.69	18.47	0.22	28.00	27.77	0.23
20051004	261470005	Michigan	St Clair	37.14	8.97	9.03	-0.07	42.74	44.20	-1.46
20060222	261470005	Michigan	St Clair	37.14	8.48	8.35	0.13	34.81	35.29	-0.48
20070921	261470005	Michigan	St Clair	37.14	20.37	20.13	0.25	30.47	30.22	0.25
20030913	550790043	Wisconsin	Milwaukee	37.10	19.39	19.02	0.36	32.92	32.64	0.27
20040906	550790043	Wisconsin	Milwaukee	37.10	20.64	20.25	0.39	35.01	34.72	0.29
20051224	550790043	Wisconsin	Milwaukee	37.10	6.47	6.52	-0.05	31.98	32.51	-0.53
20060329	550790043	Wisconsin	Milwaukee	37.10	10.86	10.81	0.05	39.24	41.14	-1.90
20071211	550790043	Wisconsin	Milwaukee	37.10	6.83	6.89	-0.06	33.76	34.31	-0.56
20030202	180890026	Indiana	Lake	37.06	10.11	10.06	0.05	36.79	37.46	-0.67
20040304	180890026	Indiana	Lake	37.06	9.35	9.30	0.05	34.06	34.68	-0.62
20050802	180890026	Indiana	Lake	37.06	17.33	16.97	0.36	36.60	36.24	0.37
20060719	180890026	Indiana	Lake	37.06	12.00	11.75	0.25	25.49	25.23	0.26
20071120	180890026	Indiana	Lake	37.06	8.42	8.51	-0.09	29.63	30.13	-0.49
20030813	180970081	Indiana	Marion	36.96	21.82	21.23	0.59	31.92	31.32	0.60
20040912	180970081	Indiana	Marion	36.96	19.19	18.67	0.52	28.14	27.61	0.53
20050627	180970081	Indiana	Marion	36.96	25.22	24.99	0.22	41.31	41.09	0.22
20060818	180970081	Indiana	Marion	36.96	20.97	20.40	0.57	30.69	30.12	0.57
20070617	180970081	Indiana	Marion	36.96	20.42	20.24	0.18	33.55	33.37	0.18
20030726	180970066	Indiana	Marion	36.92	23.32	22.68	0.63	34.78	34.14	0.64
20040608	180970066	Indiana	Marion	36.92	16.60	16.45	0.05	28.16	28.01	0.15
20050203	180970066	Indiana	Marion	36.92	11.63	11.27	0.36	39.40	41.01	-1.62
20060818	180970066	Indiana	Marion	36.92	21.40	20.82	0.58	31.96	31.38	0.59
20070617	180970066	Indiana	Marion	36.92	20.50	20.32	0.18	34.67	34.48	0.18
20030316	171191007	Illinois	Madison	36.83	12.14	11.83	0.31	35.89	39.65	-3.76
20040218	171191007	Illinois	Madison	36.83	10.51	10.24	0.27	31.15	34.40	-3.26
20050808	171191007	Illinois	Madison	36.83	26.21	25.45	0.76	39.05	38.28	0.76
20060429	171191007	Illinois	Madison	36.83	13.21	13.07	0.13	32.56	32.51	0.05
20070617	171191007	Illinois	Madison	36.83	12.84	12.71	0.13	31.66	31.61	0.05
20030202	550790010	Wisconsin	Milwaukee	36.71	8.38	8.34	0.04	29.59	31.06	-1.47
20040905	550790010	Wisconsin	Milwaukee	36.71	19.66	19.30	0.37	32.77	32.49	0.28
20050203	550790010	Wisconsin	Milwaukee	36.71	9.78	9.74	0.04	34.48	36.20	-1.71
20060329	550790010	Wisconsin	Milwaukee	36.71	10.30	10.25	0.04	36.26	38.07	-1.80
20070530	550790010	Wisconsin	Milwaukee	36.71	18.16	18.28	-0.12	35.57	35.89	-0.32
20030301	390170003	Ohio	Butler	36.59	15.51	14.95	0.56	35.99	38.23	-2.24
20040924	390170003	Ohio	Butler	36.59	23.08	22.70	0.38	30.19	29.80	0.38
20050203	390170003	Ohio		36.59	17.30	16.67	0.63	40.07		-2.50
			Butler						42.58	
20060710	390170003	Ohio	Butler	36.59	18.68	18.37	0.31	24.52	24.21	0.31
20070524	390170003	Ohio	Butler	36.59	19.80	19.78	0.02	31.48	31.45	0.02
20030316	170316005	Illinois	Cook	36.42	7.88	7.89	0.00	32.58	33.06	-0.48
20041229	170316005	Illinois	Cook	36.42	9.16	9.06	0.10	35.38	36.53	-1.15
20051221	170316005	Illinois	Cook	36.42	9.55	9.45	0.10	36.86	38.07	-1.20
20060117	170316005	Illinois	Cook	36.42	5.91	5.92	0.00	24.56	24.92	-0.36
20070530	170316005	Illinois	Cook	36.42	10.69	10.41	0.28	31.40	31.16	0.24
20030807	420031008	Pennsylvania	Allegheny	36.35	19.65	19.60	0.05	33.83	33.78	0.05
20040608	420031008	Pennsylvania	Allegheny	36.35	21.08	21.36	-0.28	36.45	36.74	-0.28
20050624	420031008	Pennsylvania	Allegheny	36.35	19.15	19.41	-0.26	33.17	33.43	-0.26
20060818	420031008	Pennsylvania	Allegheny	36.35	17.70	17.66	0.04	30.53	30.49	0.05
20070828	420031008	Pennsylvania	Allegheny	36.35	18.70	18.65	0.04	32.22	32.17	0.05
20030418	261610008	Michigan	Washtenaw	36.32	24.35	24.13	0.21	32.39	32.18	0.21
20041229	261610008	Michigan	Washtenaw	36.32	5.03	5.10	-0.06	26.73	29.37	-2.64
20050206	261610008	Michigan	Washtenaw	36.32	12.78	12.58	0.20	45.91	47.04	-1.13
20061225	261610008	Michigan	Washtenaw	36.32	5.00	5.06	-0.06	26.56	29.19	-2.62
20070906	261610008	Michigan	Washtenaw	36.32	16.15	15.85	0.30	28.65	28.35	0.31
20070700	201010000	····ciiiguii	. r usinciiaw	50.52	10.13	15.05	0.50	20.03	20.33	0.51

20030202	170312001	Illinois	Cook	36.12	9.27	9.08	0.19	34.34	34.58	-0.24
20040903	170312001	Illinois	Cook	36.12	16.44	15.91	0.53	32.57	32.04	0.53
20050203	170312001	Illinois	Cook	36.12	10.27	10.05	0.21	37.98	38.24	-0.26
20060719	170312001	Illinois	Cook	36.12	11.94	11.56	0.38	23.80	23.41	0.39
20070530	170312001	Illinois	Cook	36.12	14.77	14.40	0.37	31.12	30.76	0.36
20030316	170310052	Illinois	Cook	36.07	8.17	8.13	0.04	31.22	31.69	-0.47
20040904	170310052	Illinois	Cook	36.07	16.15	15.79	0.37	31.64	31.27	0.37
20051221	170310052	Illinois	Cook	36.07	9.96	9.87	0.08	39.51	40.60	-1.09
20060117	170310052	Illinois	Cook	36.07	6.84	6.81	0.03	26.24	26.63	-0.39
20070220	170310052	Illinois	Cook	36.07	8.73	8.68	0.04	33.33	33.83	-0.50
20030301	421330008	Pennsylvania	York	36.06	16.99	16.83	0.17	42.70	43.70	-1.00
20040224	421330008	Pennsylvania	York	36.06	11.23	11.12	0.11	28.39	29.05	-0.66
20050814	421330008	Pennsylvania	York	36.06	26.28	26.01	0.28	35.00	34.72	0.28
20060216	421330008	Pennsylvania	York	36.06	11.01	10.90	0.11	27.83	28.48	-0.65
20070226	421330008	Pennsylvania	York	36.06	13.39	13.26	0.13	33.74	34.53	-0.79
20030301	261630015	Michigan	Wayne	36.00	7.71	7.62	0.09	28.82	29.47	-0.66
20040608	261630015	Michigan	Wayne	36.00	19.87	19.80	0.07	30.54	30.47	0.07
20050913	261630015	Michigan	Wayne	36.00	26.59	26.31	0.28	42.00	41.72	0.28
20060222	261630015	Michigan	Wayne	36.00	8.44	8.34	0.10	31.52	32.23	-0.72
20070530	261630015	Michigan	Wayne	36.00	18.75	18.68	0.07	28.85	28.78	0.07
20030910	10732003	Alabama	Jefferson	35.94	11.52	11.11	0.40	29.68	29.27	0.40
20040817	10732003	Alabama	Jefferson	35.94	12.37	11.94	0.43	31.84	31.40	0.43
20050623	10732003	Alabama	Jefferson	35.94	10.58	10.63	-0.05	37.80	37.85	-0.05
20060201	10732003	Alabama	Jefferson	35.94	7.09	7.13	-0.04	35.12	35.26	-0.14
20070805	10732003	Alabama	Jefferson	35.94	12.21	11.78	0.43	31.42	30.99	0.43
20030301	390618001	Ohio	Hamilton	35.85	9.87	9.61	0.26	31.77	32.92	-1.14
20040720	390618001	Ohio	Hamilton	35.85	17.50	17.31	0.20	27.48	27.28	0.20
20050913	390618001	Ohio	Hamilton	35.85	26.68	26.38	0.30	41.62	41.32	0.30
20060908	390618001	Ohio	Hamilton	35.85	19.02	18.81	0.21	29.83	29.61	0.22
20070906	390618001	Ohio	Hamilton	35.85	19.34	19.12	0.22	30.31	30.09	0.22
20031114	171190023	Illinois	Madison	35.81	9.86	9.55	0.31	33.44	34.39	-0.95
20040729	171190023	Illinois	Madison	35.81	21.38	20.76	0.62	30.77	30.14	0.62
20050907	171190023	Illinois	Madison	35.81	25.55	24.81	0.74	36.68	35.94	0.74
20060411	171190023	Illinois	Madison	35.81	10.48	10.37	0.11	28.83	28.79	0.04
20030821	420031301	Pennsylvania	Allegheny	35.65	24.28	24.21	0.07	40.13	40.06	0.08
20040912	420031301	Pennsylvania	Allegheny	35.65	18.39	18.34	0.05	30.52	30.47	0.06
20050419	420031301	Pennsylvania	Allegheny	35.65	14.97	15.23	-0.26	30.96	31.22	-0.26
20061110	420031301	Pennsylvania	Allegheny	35.65	6.83	6.86	-0.03	31.27	31.32	-0.05
20070807	420031301	Pennsylvania	Allegheny	35.65	21.02	20.96	0.06	34.81	34.75	0.07
20030826	391130032	Ohio	Montgomery	35.61	26.88	26.61	0.27	35.23	34.95	0.28
20040903	391130032	Ohio	Montgomery	35.61	20.29	20.08	0.21	26.71	26.50	0.21
20050203	391130032	Ohio	Montgomery	35.61	4.90	4.75	0.14	39.86	41.17	-1.31
20060710	391130032	Ohio	Montgomery	35.61	18.89	18.70	0.19	24.91	24.71	0.19
20070602	391130032	Ohio	Montgomery	35.61	20.63	20.47	0.16	31.34	31.18	0.16
20030821	420030116	Pennsylvania	Allegheny	35.59	15.73	15.51	0.22	34.86	34.63	0.23
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<sup>\*</sup>the 98<sup>th</sup> percentile days were chosen based on CAMx.

Table Appendix B-2. Comparison of Sulfate and Total PM<sub>2.5</sub> for 98<sup>th</sup> Percentile Days\* for the 2014 Final Remedy.

						Sulfa	te		Total P	M2.5
Future Date	Monitor Identification Number	State	County	2012 Base Case Max. DV	CAMx	AQAT	Difference (CAMx- AQAT),	CAMx	AQAT	Difference (CAMx- AQAT), Total
	Number			Max. Dv			Sulfate			PM2.5
20050418	420030064	Pennsylvania	Allegheny	59.93	15.80	16.01	-0.22	47.16	47.68	-0.52
20030324	420030064	Pennsylvania	Allegheny	59.93	9.93	10.09	-0.15	50.84	51.30	-0.46
20041222	420030064	Pennsylvania	Allegheny	59.93	10.33	10.44	-0.11	46.29	46.59	-0.30
20061128	420030064	Pennsylvania	Allegheny	59.93	9.25	9.34	-0.10	41.48	41.75	-0.27
20071031	420030064	Pennsylvania	Allegheny	59.93	8.33	8.42	-0.09	37.41	37.65	-0.24
20030626	420030093	Pennsylvania	Allegheny	44.40	9.44	9.65	-0.21	37.96	38.57	-0.61
20040608	420030093	Pennsylvania	Allegheny	44.40	7.86	8.03	-0.17	31.68	32.19	-0.51
20050913	420030093	Pennsylvania	Allegheny	44.40	9.81	9.94	-0.13	31.65	32.08	-0.43
20070524	420030093	Pennsylvania	Allegheny	44.40	5.45	5.57	-0.12	22.14	22.49	-0.35
20060710	420030093	Pennsylvania	Allegheny	44.40	7.17	7.27	-0.09	23.28	23.59	-0.31
20070524	390350038	Ohio	Cuyahoga	41.84	14.76	15.07	-0.31	25.64	26.55	-0.91
20041115	390350038	Ohio	Cuyahoga	41.84	7.18	7.39	-0.21	32.28	33.71	-1.43
20050206	390350038	Ohio	Cuyahoga	41.84	10.43	10.61	-0.18	38.13	39.04	-0.91
20030220	390350038	Ohio	Cuyahoga	41.84	9.08	9.24	-0.16	33.27	34.06	-0.79
20060222	390350038	Ohio	Cuyahoga	41.84	7.61	7.74	-0.13	27.97	28.63	-0.66
20041117	261630016	Michigan	Wayne	41.28	4.47	4.58	-0.11	25.88	26.12	-0.24
20071120	261630016	Michigan	Wayne	41.28	3.91	4.01	-0.09	22.71	22.92	-0.21
20050206	261630016	Michigan	Wayne	41.28	9.73	9.77	-0.04	41.38	41.51	-0.13
20030221	261630016	Michigan	Wayne	41.28	9.18	9.22	-0.04	39.06	39.19	-0.12
20060330	261630016	Michigan	Wayne	41.28	7.72	7.75	-0.03	32.92	33.02	-0.10
20051004	390350060	Ohio	Cuyahoga	40.85	10.79	11.11	-0.32	36.64	37.61	-0.97
20030130	390350060	Ohio	Cuyahoga	40.85	7.08	7.20	-0.12	30.60	31.23	-0.63
20040310	390350060	Ohio	Cuyahoga	40.85	6.79	6.91	-0.12	29.38	29.98	-0.60
20070310	390350060	Ohio	Cuyahoga	40.85	5.56	5.66	-0.10	24.14	24.64	-0.49
20060309	390350060	Ohio	Cuyahoga	40.85	5.17	5.26	-0.09	22.49	22.95	-0.46
20040903	170311016	Illinois	Cook	40.44	9.47	9.60	-0.13	31.23	31.54	-0.32
20050627	170311016	Illinois	Cook	40.44	11.27	11.39	-0.12	39.68	39.97	-0.29
20060818	170311016	Illinois	Cook	40.44	7.32	7.42	-0.10	24.25	24.49	-0.24
20070530	170311016	Illinois	Cook	40.44	7.54	7.62	-0.08	26.71	26.91	-0.19
20030316	170311016	Illinois	Cook	40.44	7.61	7.61	0.00	37.60	37.68	-0.08
20050627	261630033	Michigan	Wayne	39.81	20.76	21.08	-0.32	38.11	38.86	-0.75

20061213	261630033	Michigan	Wayne	39.81	5.22	5.34	-0.12	36.30	36.63	-0.33
20041117	261630033	Michigan	Wayne	39.81	4.17	4.27	-0.10	29.10	29.37	-0.26
20071226	261630033	Michigan	Wayne	39.81	4.07	4.17	-0.10	28.44	28.70	-0.26
20030304	261630033	Michigan	Wayne	39.81	8.26	8.29	-0.03	35.29	35.40	-0.12
20030415	180890022	Indiana	Lake	39.58	21.84	22.04	-0.20	36.94	37.24	-0.30
20041226	180890022	Indiana	Lake	39.58	8.81	8.90	-0.10	37.62	37.82	-0.19
20050116	180890022	Indiana	Lake	39.58	8.86	8.86	0.00	33.76	33.83	-0.07
20070310	180890022	Indiana	Lake	39.58	7.48	7.48	0.00	28.58	28.64	-0.06
20060123	180890022	Indiana	Lake	39.58	6.21	6.21	0.00	23.83	23.88	-0.05
20030626	540090011	West Virginia	Brooke	38.39	16.21	16.52	-0.31	28.97	29.66	-0.69
20040702	540090011	West Virginia	Brooke	38.39	10.21	10.32	-0.20	29.26	29.75	-0.50
					9.82	10.40				
20070828	540090011	West Virginia	Brooke Brooke	38.39			-0.19	28.20	28.68	-0.48
20051112	540090011	West Virginia		38.39	5.98	6.09	-0.11	29.12	29.48	-0.36
20061110	540090011	West Virginia	Brooke	38.39	5.38	5.48	-0.10	26.27	26.60	-0.32
20041009	420710007	Pennsylvania	Lancaster	38.37	3.70	3.74	-0.04	29.12	29.21	-0.10
20030313	420710007	Pennsylvania	Lancaster	38.37	10.63	10.64	-0.01	43.55	43.66	-0.11
20050209	420710007	Pennsylvania	Lancaster	38.37	9.32	9.33	-0.01	38.26	38.36	-0.10
20060330	420710007	Pennsylvania	Lancaster	38.37	7.88	7.89	-0.01	32.41	32.50	-0.08
20070301	420710007	Pennsylvania	Lancaster	38.37	7.67	7.68	0.00	31.58	31.66	-0.08
20041229	390350045	Ohio	Cuyahoga	38.13	7.73	7.96	-0.23	26.40	27.61	-1.21
20050305	390350045	Ohio	Cuyahoga	38.13	7.45	7.58	-0.13	27.56	28.20	-0.64
20030319	390350045	Ohio	Cuyahoga	38.13	6.98	7.11	-0.12	25.89	26.49	-0.60
20070310	390350045	Ohio	Cuyahoga	38.13	6.23	6.34	-0.11	23.16	23.69	-0.53
20060222	390350045	Ohio	Cuyahoga	38.13	6.06	6.17	-0.11	22.54	23.06	-0.52
20040702	390811001	Ohio	Jefferson	37.88	9.67	9.85	-0.19	29.82	30.31	-0.49
20030814	390811001	Ohio	Jefferson	37.88	8.57	8.73	-0.16	26.48	26.92	-0.44
20050913	390811001	Ohio	Jefferson	37.88	8.28	8.44	-0.16	25.62	26.04	-0.42
20060117	390811001	Ohio	Jefferson	37.88	7.38	7.51	-0.14	21.68	22.08	-0.40
20070804	390811001	Ohio	Jefferson	37.88	6.41	6.53	-0.12	19.93	20.26	-0.33
20041117	261630019	Michigan	Wayne	37.83	3.86	3.96	-0.10	27.56	27.76	-0.21
20050206	261630019	Michigan	Wayne	37.83	10.63	10.65	-0.03	46.77	46.95	-0.18
20060309	261630019	Michigan	Wayne	37.83	7.32	7.34	-0.02	32.39	32.51	-0.12
20030304	261630019	Michigan	Wayne	37.83	6.83	6.85	-0.02	30.24	30.36	-0.12
20070217	261630019	Michigan	Wayne	37.83	4.94	4.96	-0.02	22.03	22.11	-0.08
20050627	390350065	Ohio	Cuyahoga	37.67	15.41	15.73	-0.33	30.29	31.33	-1.03
20030702	390350065	Ohio	Cuyahoga	37.67	13.41	13.77	-0.33	23.93	24.96	-1.03
20070906	390350065	Ohio	Cuyahoga	37.67	12.98	13.22	-0.23	23.00	23.99	-0.99
20040212	390350065	Ohio	Cuyahoga	37.67	6.42	6.53	-0.11	23.60	24.15	-0.55
20060210	390350065	Ohio	Cuyahoga	37.67	5.61	5.71	-0.10	20.69	21.17	-0.48
20050627	170313301	Illinois	Cook	37.67	12.27	12.36	-0.09	36.65	36.87	-0.22
20070617	170313301	Illinois	Cook	37.67	9.40	9.47	-0.07	28.19	28.35	-0.17
20030214	170313301	Illinois	Cook	37.67	6.19	6.19	0.00	31.42	31.48	-0.06
20040227	170313301	Illinois	Cook	37.67	5.84	5.84	0.00	29.68	29.74	-0.06
20060306	170313301	Illinois	Cook	37.67	4.22	4.22	0.00	21.58	21.62	-0.04
20040608	420070014	Pennsylvania	Beaver	37.42	10.19	10.39	-0.20	23.91	24.41	-0.49
20070602	420070014	Pennsylvania	Beaver	37.42	9.08	9.25	-0.18	21.36	21.80	-0.44
20061128	420070014	Pennsylvania	Beaver	37.42	5.47	5.59	-0.13	31.18	31.55	-0.37
20051127	420070014	Pennsylvania	Beaver	37.42	5.11	5.23	-0.12	29.19	29.53	-0.34
20031105	420070014	Pennsylvania	Beaver	37.42	4.17	4.27	-0.10	23.93	24.21	-0.28
20040924	420033007	Pennsylvania	Allegheny	37.40	9.16	9.32	-0.17	23.11	23.49	-0.38
20030626	420033007	Pennsylvania	Allegheny	37.40	10.68	10.83	-0.15	40.46	40.86	-0.40
20050627	420033007	Pennsylvania	Allegheny	37.40	5.57	5.65	-0.08	21.34	21.55	-0.21
20061125	420033007	Pennsylvania	Allegheny	37.40	1.58	1.60	-0.02	24.46	24.59	-0.13
20071208	420033007	Pennsylvania	Allegheny	37.40	1.37	1.39	-0.01	21.26	21.37	-0.11
20031115	10730023	Alabama	Jefferson	37.33	6.47	6.45	0.01	27.57	27.66	-0.09
20040225	10730023	Alabama	Jefferson	37.33	6.46	6.43	0.04	29.97	30.04	-0.07
20070326	10730023	Alabama	Jefferson	37.33	6.76	6.72	0.04	31.34	31.41	-0.07
20060704	10730023	Alabama	Jefferson	37.33	10.33	10.12	0.04	29.20	29.07	0.13
20050704	10730023	Alabama	Jefferson	37.33	12.19	11.95	0.25	34.37	34.22	0.15
20061125	550790026	Wisconsin	Milwaukee	37.24	6.05	6.12	-0.07	35.65		-0.20
		Wisconsin	Milwaukee	37.24	5.52	5.58	-0.07		35.85 32.74	-0.20
20071211	550790026				6.99	6.99		32.56		-0.18
20050131	550790026	Wisconsin	Milwaukee	37.24			0.00	30.64	30.72	
20030307	550790026	Wisconsin	Milwaukee	37.24	5.78	5.78	0.00	25.40	25.46	-0.06
20040110	550790026	Wisconsin	Milwaukee	37.24	5.51	5.51	0.00	24.27	24.32	-0.06
20050910	180970043	Indiana	Marion	37.20	16.70	17.10	-0.40	31.49	32.13	-0.64
20070617	180970043	Indiana	Marion	37.20	11.68	12.06	-0.38	24.60	25.26	-0.66
20060818	180970043	Indiana	Marion	37.20	11.97	12.25	-0.29	22.70	23.16	-0.46
20030313	180970043	Indiana	Marion	37.20	5.77	5.82	-0.05	25.92	26.11	-0.19
20040227	180970043	Indiana	Marion	37.20	5.53	5.58	-0.05	24.86	25.04	-0.18
20051004	261470005	Michigan	St Clair	37.14	5.51	5.67	-0.17	40.08	40.84	-0.76
20070524	261470005	Michigan	St Clair	37.14	13.75	13.87	-0.12	23.60	24.09	-0.49
20060222	261470005	Michigan	St Clair	37.14	7.39	7.42	-0.03	34.24	34.36	-0.11
20030307	261470005	Michigan	St Clair	37.14	6.30	6.33	-0.03	29.28	29.38	-0.10
20040325	261470005	Michigan	St Clair	37.14	5.25	5.27	-0.02	24.50	24.58	-0.08
20040906	550790043	Wisconsin	Milwaukee	37.10	11.32	11.38	-0.06	25.66	25.85	-0.20
20060329	550790043	Wisconsin	Milwaukee	37.10	8.88	8.89	-0.01	39.14	39.22	-0.08
20030316	550790043	Wisconsin	Milwaukee	37.10	6.84	6.85	-0.01	30.26	30.32	-0.06
20071120	550790043	Wisconsin	Milwaukee	37.10	5.50	5.50	0.00	30.83	30.91	-0.09
20051224	550790043	Wisconsin	Milwaukee	37.10	5.63	5.63	0.00	31.53	31.61	-0.09
20050203	180890026	Indiana	Lake	37.06	8.03	8.08	-0.05	33.45	33.59	-0.14
20040304	180890026	Indiana	Lake	37.06	7.99	8.04	-0.05	33.28	33.42	-0.14
20030226	180890026	Indiana	Lake	37.06	7.93	7.98	-0.05	33.02	33.16	-0.14
20070220	180890026	Indiana	Lake	37.06	6.10	6.14	-0.04	25.54	25.64	-0.10
20060123	180890026	Indiana	Lake	37.06	5.71	5.74	-0.03	23.90	24.00	-0.10
20050910	180970081	Indiana	Marion	36.96	17.37	17.78	-0.41	32.00	32.66	-0.66
20070617	180970081	Indiana	Marion	36.96	11.14	11.50	-0.36	24.00	24.63	-0.63
20030130	180970081	Indiana	Marion	36.96	5.95	6.00	-0.05	25.86	26.05	-0.19
20060306	180970081	Indiana	Marion	36.96	5.78	5.84	-0.05	25.14	25.33	-0.18
20040224	180970081	Indiana	Marion	36.96	5.28	5.33	-0.05	23.01	23.18	-0.17
20040224	180970081	Indiana	Marion	36.92	16.90	17.31	-0.40	32.11	32.77	-0.17
20070803	180970066	Indiana	Marion	36.92	14.77	15.12	-0.35	28.12	28.70	-0.57
20070803	180970066	Indiana	Marion	36.92	13.85	14.18	-0.33	26.40	26.93	-0.54
20060222	180970066	Indiana	Marion	36.92	5.79	5.84	-0.33 -0.05	25.66	25.85	-0.54 -0.19
20000222	1007/0000		.11011011	30.72	3.17	2.04	-0.03	20.00	20.00	-0.17

20040224	180970066	Indiana	Marion	36.92	5.27	5.32	-0.05	23.44	23.61	-0.17
20050227	171191007	Illinois	Madison	36.83	8.60	8.74	-0.13	34.53	34.59	-0.06
20040116	171191007	Illinois	Madison	36.83	6.67	6.77	-0.10	26.89	26.93	-0.04
20060126	171191007	Illinois	Madison	36.83	6.35	6.45	-0.10	25.62	25.66	-0.04
	171191007		Madison	36.83	6.05	6.14	-0.09			-0.04
20070220		Illinois						24.43	24.47	
20031114	171191007	Illinois	Madison	36.83	6.50	6.54	-0.04	30.13	30.25	-0.11
20060329	550790010	Wisconsin	Milwaukee	36.71	8.42	8.43	-0.01	36.17	36.25	-0.07
20050131	550790010	Wisconsin	Milwaukee	36.71	7.39	7.40	-0.01	31.83	31.89	-0.06
20030202	550790010	Wisconsin	Milwaukee	36.71	6.85	6.86	-0.01	29.52	29.58	-0.06
20040223	550790010	Wisconsin	Milwaukee	36.71	5.59	5.60	-0.01	24.19	24.24	-0.05
20071211	550790010	Wisconsin	Milwaukee	36.71	5.57	5.57	0.00	31.17	31.26	-0.09
20050203	390170003	Ohio	Butler	36.59	12.09	12.27	-0.18	37.83	38.18	-0.35
20070530	390170003	Ohio	Butler	36.59	11.14	11.31	-0.17	23.14	23.56	-0.43
20040924	390170003	Ohio	Butler	36.59	10.97	11.10	-0.14	17.90	18.21	-0.31
20030318	390170003	Ohio	Butler	36.59	7.38	7.49	-0.11	23.28	23.49	-0.21
20060222	390170003	Ohio	Butler	36.59	6.30	6.39	-0.09	19.95	20.13	-0.18
20051221	170316005	Illinois	Cook	36.42	7.64	7.76	-0.12	36.24	36.38	-0.14
20041229	170316005	Illinois	Cook	36.42	7.33	7.44	-0.11	34.78	34.91	-0.13
20070617	170316005	Illinois	Cook	36.42	7.29	7.37	-0.09	29.17	29.36	-0.18
20030316	170316005	Illinois	Cook	36.42	6.87	6.88	-0.01	31.96	32.05	-0.10
20060123	170316005	Illinois	Cook	36.42	5.10	5.10	-0.01	23.84	23.92	-0.07
20040608	420031008	Pennsylvania	Allegheny	36.35	11.00	11.24	-0.24	26.03	26.61	-0.58
20050627	420031008	Pennsylvania	Allegheny	36.35	10.04	10.26	-0.22	23.81	24.35	-0.53
20030821	420031008	Pennsylvania	Allegheny	36.35	9.99	10.15	-0.16	24.71	25.19	-0.48
20070310	420031008	Pennsylvania	Allegheny	36.35	6.69	6.81	-0.12	24.20	24.56	-0.36
20060222	420031008	Pennsylvania	Allegheny	36.35	6.01	6.12	-0.11	21.80	22.12	-0.33
20051004	261610008			36.32	3.74	3.86	-0.12	32.73	32.74	-0.02
		Michigan	Washtenaw							
20031009	261610008	Michigan	Washtenaw	36.32	3.34	3.45	-0.11	29.24	29.26	-0.01
20061225	261610008	Michigan	Washtenaw	36.32	3.11	3.22	-0.10	27.33	27.34	-0.01
20071226	261610008	Michigan	Washtenaw	36.32	2.55	2.63	-0.08	22.45	22.46	-0.01
20040304	261610008	Michigan	Washtenaw	36.32	5.96	5.99	-0.03	25.67	25.77	-0.11
20030403	170312001	Illinois	Cook	36.12	12.30	12.41	-0.11	32.55	32.76	-0.21
20070617	170312001	Illinois	Cook	36.12	10.12	10.20	-0.09	26.85	27.02	-0.17
20050203	170312001	Illinois	Cook	36.12	9.00	9.00	-0.01	37.12	37.19	-0.07
20040227	170312001	Illinois	Cook	36.12	6.42	6.43	0.00	26.63	26.68	-0.05
20060117	170312001	Illinois	Cook	36.12	4.88	4.89	0.00	20.37	20.41	-0.04
20041230	170310052	Illinois	Cook	36.07	5.78	5.90	-0.11	28.34	28.53	-0.19
20061229	170310052	Illinois	Cook	36.07	5.14	5.24	-0.10	25.24	25.41	-0.17
20050205	170310052	Illinois	Cook	36.07	7.63	7.65	-0.02	32.74	32.86	-0.11
20070308	170310052	Illinois	Cook	36.07	7.31	7.34	-0.02	31.42	31.53	-0.11
20030226	170310052	Illinois	Cook	36.07	6.77	6.79	-0.02	29.11	29.21	-0.10
20071208			York	36.06	4.92	5.00	-0.02	29.97	30.07	-0.10
	421330008	Pennsylvania								
20030301	421330008	Pennsylvania	York	36.06	14.24	14.33	-0.08	41.07	41.20	-0.14
20041123	421330008	Pennsylvania	York	36.06	4.45	4.53	-0.08	27.17	27.26	-0.09
20050206	421330008	Pennsylvania	York	36.06	11.35	11.41	-0.07	32.81	32.92	-0.11
20060216	421330008	Pennsylvania	York	36.06	9.23	9.28	-0.05	26.77	26.86	-0.09
20051004	261630015	Michigan	Wayne	36.00	5.94	6.09	-0.14	36.16	36.50	-0.34
20041229	261630015	Michigan	Wayne	36.00	4.53	4.63	-0.11	27.65	27.91	-0.26
20060222	261630015	Michigan	Wayne	36.00	7.40	7.43	-0.03	31.22	31.32	-0.10
				36.00	6.73	6.76	-0.03	28.46	28.55	-0.10
20030214	261630015	Michigan	Wayne							
20070325	261630015	Michigan	Wayne	36.00	5.32	5.34	-0.02	22.58	22.65	-0.07
20061210	10732003	Alabama	Jefferson	35.94	6.17	6.24	-0.07	31.19	31.44	-0.26
20070815	10732003	Alabama	Jefferson	35.94	7.88	7.76	0.12	27.22	27.18	0.04
20030415	10732003	Alabama	Jefferson	35.94	5.24	5.09	0.14	25.94	25.93	0.01
20050921	10732003	Alabama	Jefferson	35.94	9.82	9.68	0.14	33.82	33.77	0.05
20040610	10732003	Alabama	Jefferson	35.94	5.90	5.74	0.16	29.17	29.16	0.02
20050910	390618001	Ohio	Hamilton	35.85	13.46	13.74	-0.27	29.11	29.64	-0.53
		Ohio	Hamilton	35.85	9.58	9.76	-0.18	22.95	23.35	-0.40
20070527	390618001									
20030316	390618001	Ohio	Hamilton	35.85	5.98	6.14	-0.15	25.39	25.65	-0.26
20040218	390618001	Ohio	Hamilton	35.85	5.74	5.88	-0.15	24.37	24.62	-0.25
20060222	390618001	Ohio	Hamilton	35.85	5.41	5.55	-0.14	23.00	23.23	-0.24
20050227	171190023	Illinois	Madison	35.81	9.01	9.15	-0.14	33.18	33.22	-0.04
20030304	171190023	Illinois	Madison	35.81	8.41	8.54	-0.13	30.99	31.03	-0.04
20060222	171190023	Illinois	Madison	35.81	6.75	6.85	-0.10	24.96	25.00	-0.03
20040424		Illinois	Madison				-0.05			
	171190023			35.81	6.03	6.08		23.84	23.99	-0.15
20070906	420031301	Pennsylvania	Allegheny	35.65	11.73	11.91	-0.18	26.27	26.71	-0.44
20030221	420031301	Pennsylvania	Allegheny	35.65	8.65	8.81	-0.17	28.93	29.33	-0.40
20060710	420031301	Pennsylvania	Allegheny	35.65	10.34	10.50	-0.16	23.22	23.61	-0.39
20050624	420031301	Pennsylvania	Allegheny	35.65	8.37	8.53	-0.15	24.57	24.92	-0.35
20040512	420031301	Pennsylvania	Allegheny	35.65	7.82	7.96	-0.14	22.97	23.30	-0.32
20030624	391130032	Ohio	Montgomery	35.61	13.74	13.97	-0.23	26.72	27.21	-0.49
20070530	391130032	Ohio	Montgomery	35.61	11.68	11.88	-0.20	22.80	23.21	-0.42
20070330	391130032	Ohio	Montgomery	35.61	2.34	2.37	-0.03	25.66	25.87	-0.42
20040131	391130032	Ohio	Montgomery	35.61	1.84	1.87	-0.02	20.36	20.53	-0.17
20060309	391130032	Ohio	Montgomery	35.61	1.74	1.76	-0.02	19.22	19.37	-0.16
20051004	420030116	Pennsylvania	Allegheny	35.59	8.27	8.46	-0.19	24.05	24.45	-0.40
20040608	420030116	Pennsylvania	Allegheny	35.59	8.95	9.12	-0.17	26.74	27.25	-0.51
20030821	420030116	Pennsylvania	Allegheny	35.59	7.42	7.58	-0.16	26.23	26.70	-0.47
*4 ooth			1 1	O 4						

\*the 98<sup>th</sup> percentile days were chosen based on CAMx.

Appendix C:	Description of Signi	of Excel Spre ficant Contr	adsheet Data ibution Anal	a Files for Tra ysis	ansport Rule

EPA placed the following Excel spreadsheet file in the Transport Rule docket and on EPA's website at [placeholder for website]:

The annual and quarterly emissions for all AQAT simulations can be found in this file. AQAT emissions.xlsx

These files contain the 24-hour PM2.5 2012 base case and 2014 AQAT Calibration Scenario contributions.

QTR1 base and AQAT calibration scenario contributions.xlsx

QTR2 base and AQAT calibration scenario contributions.xlsx

QTR3 base and AQAT calibration scenario contributions.xlsx

QTR4 base and AQAT calibration scenario contributions.xlsx

The annual PM2.5 and 24-hour PM2.5 calibration factors can be found in the respective files.

Annual PM Calib Factors.xlsx

Daily PM Calibration Factors.xlsx

These files contain the quarterly contributions and calibrated Relative Response Factors (RRFs) for all 24-hour PM2.5 simulations.

dailyPM adjusted sulfate contributions and RRF 2014 base.xlsx

dailyPM adjusted sulfate contributions and RRF 2012 base wleakage.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 500CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 1600CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2800CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 3300CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 10000CT.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 1600 remedy.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300 remedy.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2800 remedy.xlsx

These files contain the quarterly contributions and calibrated RRFs for the variability assessments. The first four files assume that the "home" state (the state where the receptor is located) is also varying. The next four files in the list assume that the home state is held constant at the \$2300/ton level. The number associated with "var" in the title notes the level of emissions variation above the level of the budget in the simulation.

```
dailyPM adjusted sulfate contributions and RRF 2014 2300CT 20var.xlsx
```

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 15var.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 10var.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 05var.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 20var home 2300.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 15var home 2300.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 10var home 2300.xlsx

dailyPM adjusted sulfate contributions and RRF 2014 2300CT 05var home 2300.xlsx

This file contains a summary of the estimated 98th percentile values and resulting average and maximum design values for all 24-hour PM2.5 AQAT cost threshold level, variability analyses, and remedy simulations.

dailyPM allyears high quarters.xlsx

These files apply the RRFs to each of the 32 days per year for each of the 5 years of available receptor estimates. The result is the estimated 24-hour PM2.5 concentration for that day. The 98th percentile day is also identified in these files. They are all in 2014 unless otherwise specified in the title of the file.

```
dailyPM_all_years_all_quarters_base_xlsx
dailyPM_all_years_all_quarters_base_500CT.xlsx
dailyPM_all_years_all_quarters_base_1600CT.xlsx
dailyPM_all_years_all_quarters_base_2300CT.xlsx
dailyPM_all_years_all_quarters_base_2800CT.xlsx
dailyPM_all_years_all_quarters_base_3300CT.xlsx
dailyPM_all_years_all_quarters_base_10000CT.xlsx
dailyPM_all_years_all_quarters_base_2012_leakage.xlsx
dailyPM_all_years_all_quarters_base_2014_leakage.xlsx
dailyPM_all_years_all_quarters_1600_remedy.xlsx
dailyPM_all_years_all_quarters_2300_remedy.xlsx
dailyPM_all_years_all_quarters_10000_remedy.xlsx
```

These are the same as the files above, but were used in the variability analysis. The "home" state, containing the monitor was controlled at \$2300/ton and also increased with the variability level. The level of variability is noted in the name of the file.

```
dailyPM_all_years_all_quarters_base_2300CT_20perc_whome.xlsx dailyPM_all_years_all_quarters_base_2300CT_15perc_whome.xlsx dailyPM_all_years_all_quarters_base_2300CT_10perc_whome.xlsx dailyPM_all_years_all_quarters_base_2300CT_05perc_whome.xlsx
```

These are the same files as above, but the home state was held constant at the \$2300/ton cost threshold level. dailyPM\_all\_years\_all\_quarters\_base\_2300CT\_20perc\_whomeat2300.xlsx dailyPM\_all\_years\_all\_quarters\_base\_2300CT\_15perc\_whomeat2300.xlsx dailyPM\_all\_years\_all\_quarters\_base\_2300CT\_10perc\_whomeat2300.xlsx dailyPM\_all\_years\_all\_quarters\_base\_2300CT\_05perc\_whomeat2300.xlsx

The annual PM25 AQAT.xlsx file contains the base contributions, AQAT calibration scenario contributions, calibrated contributions, and estimated design values for all annual PM2.5 AQAT simulations.

The AQAT vs. CAMx.xlsx file contains the 2014 base case and 2014 remedy comparisons for AQAT and CAMx.